

Roblox's response to the four expectation areas

Ofcom's expectation 1

Implement the full protections for children that Ofcom recommends in our Illegal Content and Protection of Children Codes under the Online Safety Act, and without delay.

• Put in place grooming protections to stop adults from being able to contact children they do not know. To be fully effective this means checking the ages of users with highly effective age assurance, so that you can apply these protections to all under 18s.

In the First Letter:

My team is keen to understand your assessment of the results of that implementation [age assurance for users who wish to use chat functions] and what difference you expect it to make to your risk levels in the future, and I invite you to include that in your response.

This in the context of the Second Letter

Additionally, the Press Release refers to Roblox's efforts on age assurance and, specifically, restricting adults from contacting children they don't know.

In the Press Release:

Failsafe grooming protections. This means ensuring strict controls to stop strangers being able to contact children they do not know on their platforms. That includes using highly effective age assurance to check users' ages.

Roblox has put age checks in to restrict adults from contacting children they don't know.

Legal note

We note the call to "implement the full protections for children that Ofcom recommends in our Illegal Content and Protection of Children Codes under the Online Safety Act, and without delay". Framing expectations solely in terms of full implementation of every Code measure is difficult to reconcile with the architecture of the Online Safety framework, which expressly:

- (a) requires service providers to take or use measures that are proportionate to the findings of their most recent risk assessment; and
- (b) allows services to discharge their duties through appropriate alternative measures.

In Roblox's case in particular, neither the Online Safety Act nor Ofcom's Protection of Children Code places us under a specific duty or recommendation to implement a form of "highly effective age assurance".

Therefore, our voluntary engagement with this programme and the fact that we describe certain measures and features in this response does not mean that Roblox accepts it is legally required under the Online Safety Act, or recommended by Ofcom's Codes, to implement all of the measures. Their inclusion here is without prejudice to Roblox's legal position on the scope of our statutory duties and on the status of any individual measure as voluntary or alternative. The list is not exhaustive.

As part of our multilayered approach to safety, Roblox has put in place various protections designed to stop adults from being able to contact children they do not know. We set out details of these below. These protections build on a foundation of functionality limitations and choices which were already in place and distinguished us from other platforms, including limitations on image and video sharing in chat, and the sharing of external links.

Age assurance and age-based chat

As acknowledged by Ofcom, as of January 2026, all users globally must now complete a facial age check to access chat functionality on Roblox. The technology used by our vendor, Persona, has been tested and certified by third-party laboratories. The age estimation models used achieved a Mean Absolute Error of 1.4 years for users younger than 18, based on testing by the Age Check Certification Scheme in the U.K.¹ Because this rollout is global, a user cannot use a VPN to switch territories and evade this check.

We're aware of how impactful this change is and that mistakes can happen. If a facial age check needs correcting, users 18 or older have a one-time reset option in their Account Settings to redo their age-check and can also use ID verification. Parents or caregivers have a one-time opportunity to correct their child's age via parental controls.² We recognise there are other, non-technical ways, to circumvent online safety rules, for example using someone else's account, switching or sharing devices with siblings and adults. To try to address the risks of this we also use behavioural signals to spot possible age mismatches: for example, if someone age-checked as a younger child has a pattern of gameplay over time that indicated they may actually be a teen or adult, they may be prompted to complete an additional age check³.

¹ [A New Era of Safety: Facial Age Checks Now Required to Chat on Roblox](#)

² [Moving Beyond Self-Reported Age](#)

³ [Moving Beyond Self-Reported Age](#)

Users are placed into age bands based on this age check for “age-based chat”, so children can only communicate with peers in similar age ranges and trusted friends⁴. Details of the types of chat these age restrictions apply to can be found [here](#) and below.

- Under 9
 - Experience chat: off by default. Can be updated using parental controls but under 9s remain restricted to in-game chat with under-13 users and their trusted friends. No voice chat.
 - Party chat: Unavailable. ●
- 9-12
 - Experience chat: on by default, direct experience chat (1:1 messaging) is off by default. The defaults can be updated using parental controls but 9-12 year olds are restricted to chat with under 16s and trusted friends. Voice chat is unavailable.
 - Party chat: set to trusted friends only by default. Voice chat is unavailable.
- Parental controls enable changes. ● 13-15
 - Experience chat: on by default but restricted to chat with users aged 9-17 and trusted friends. Both text and voice chat is available.
 - Party chat: on by default but restricted to chat with users aged 9-17 and trusted friends. Voice chat is available for trusted friends.
- 16-17
 - Experience chat: on but restricted to chat with users aged 13-24 and trusted friends. Both text and voice chat is available.
 - Party chat: on by default but restricted to chat with users aged 13-24 and trusted friends. Voice chat is available for trusted friends.
- 18+
 - Experience chat: on but restricted to chat with 16+ users and trusted friends. Both text and voice chat is available.
 - Party chat: on by default but restricted to chat with 16+ users and trusted friends. Both text and voice chat is available.

Moderation

In addition to imposing restrictions on access chat, we deploy various measures to enforce our Community Standards across the Roblox platform. Our Child Exploitation Community Standard prohibits the exploitation of minors, including:

- Any predatory behavior, including attempting to connect with a minor in order to manipulate and exploit them
- Sexualizing minors in any way

⁴ [Safer Settings for All Ages](#)

- Engaging in sexual conversation with or soliciting sexual material from minors
- Sharing, requesting, or discussing child sexual exploitation material
- Sexual extortion of children
- Child sex trafficking
- Coercion and enticement of a minor to engage in illegal sexual activity

A combination of automated and human content moderation systems plays a crucial role in enforcing our policies by proactively identifying and removing violative content.⁵ We do not encrypt communication. We use sophisticated AI algorithms to detect child exploitation risks and grooming patterns in voice and text messages. Safety filters block inappropriate content and personal information, and messages with profanity are rephrased to keep conversations age-appropriate.⁶

[Redacted information to avoid disclosing technical details that could be used by bad actors to circumvent our controls]

Design features that reduce contact opportunities

Roblox has a number of features that are designed to reduce contact opportunities between adults and children they don't know. These include changes Roblox has implemented in the UK to comply with the Codes. For example, unlike many platforms, we continue to prohibit image and video sharing in chat, and the functionality simply does not exist on Roblox.⁷ [List of examples redacted to avoid disclosing technical details that could be used by bad actors to circumvent our controls]

User and parent controls

In addition to the above features, Roblox has various features designed to empower users to restrict who they are contacted by. These include changes Roblox has implemented in the UK to comply with the Codes. For example, users (and caretakers with parental controls) can block and report other users at any time. Once an adult is blocked, they cannot continue to message, re-friend or invite that child.²⁶ [ICU J1]. [List of examples redacted to avoid disclosing technical details that could be used by bad actors to circumvent our controls]

Verified parents or caregivers get a dashboard of controls: they can choose who can message or chat with their child in experience, party and direct chat (from friends to no one), who can join

⁵ [EU DSA Transparency Report 2025](#)

⁶ [Safety Features: Chat, Privacy & Filtering](#)

⁷ [Roblox Requires Age Checks for Communication, Ushering in New Safety Standard](#) ²⁶
[How to block another user](#)



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private servers, view and manage the child's friends list, and block or report users on the child's behalf.

Taken together, these safeguards are designed to prevent unknown adults from initiating or maintaining contact with children on Roblox.

We also strongly encourage parents and caregivers to talk to their children about internet safety, including online grooming.⁸ Parents and caregivers can visit Roblox's Safety Center to learn more about our safety work and ways to keep their children safe online.⁹

Future developments

The First Letter asks us to include an assessment of the results of our roll out of age checks for chat and what difference we expect it to make to risk levels in the future. Prior to rolling out the facial age check, we evaluated it carefully for accuracy, reliability and robustness, among other considerations, and we still review those factors regularly. As the feature was only recently introduced, we are currently assessing its overall impact in use. It is important to note and repeat that facial age checks add a powerful layer by limiting communication between children and unknown adults, but it is not the only layer - moderation and various design features support this. Our focus now is on strengthening, testing and monitoring these systems so they continue to work effectively for all users.

Building on age checks, in June we will also be introducing two new age-based accounts for younger users on Roblox: Roblox Kids for users ages 5 to 8 and Roblox Select for users ages 9 to 15.¹⁰ For ages 5–8 all communication will be kept disabled by default and the design will include a distinct background color across the app experience to indicate account type. Further details of what the account types will have access to are below:

⁸ [A New Era of Safety: Facial Age Checks Now Required to Chat on Roblox](#)

⁹ [Parental controls](#) & [Our commitment to safety](#)

¹⁰ [Roblox Introduces New Age-Based Accounts and Expanded Parental Controls for Users Under 16](#)



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Roblox accounts			
	Roblox Kids (Age-checked 5-8)*	Roblox Select (Age-checked 9-15)*	Roblox (Age-checked 16+)
Content Ratings	Minimal or Mild	Minimal, Mild, or Moderate	All rated content, except Restricted**
Chat	Chat is off by default and can be enabled through a linked parental account.	If available in your region, Chat is gradually introduced with safeguards.	If available in your region, Chat is on by default.
Parental Controls***	Full suite of parental controls, including new approved experience controls.	Full suite of parental controls through age 12. Certain controls and visibility into kids' accounts available through age 15.	Visibility into friends, screen time, and spending available through age 18.

* Ages vary by region. Ages are based on facial age checks and a parent can correct a child's age if necessary. No system is perfect, and we cannot prevent all objectionable content from appearing on Roblox. But we believe these new changes will further minimize the chance of violative content reaching our youngest users.
** Restricted content is designed for users 18+.
*** More details about Parental Controls can be found on roblox.com/families.

Ofcom's expectation 2

Implement the full protections for children that Ofcom recommends in our Illegal Content and Protection of Children Codes under the Online Safety Act, and without delay.

- Make recommender systems safe. We have already started a review of the child-accessible content recommender systems of the biggest platforms most popular with children.*

Under the Online Safety Act, children must be prevented from encountering suicide and self-harm material, pornography and eating disorder content and protected from encountering violent content, abuse and hate, dangerous stunts and challenges and other harmful content. Our Children's Code contains protective measures to stop recommender systems actively pushing this content in children's feeds, and we are concerned that these may not have been effectively implemented across all platforms children use. Due to the differences and complexities of services' recommender systems, our assessment will take some months to conclude, but we will not hesitate to take enforcement action if we see failure. In the meantime, we ask those services with recommender algorithms to state publicly how they are meeting these essential requirements of the Online Safety Act, and how they will demonstrate success.

In the Press Release:

Safer feeds for children. Algorithms are children's main pathway to harm online. To inform our assessment of these systems, we are issuing legally-binding information requests to large

platforms. Given the complexities and technical nature of this work, it will take time to assess their responses. However, we will not hesitate to take enforcement action if we identify failings in how companies promote content to children.

As mentioned above, Roblox has not received the legally binding information requests on recommender systems referred to in Ofcom's Press Release. It is important that any public commentary makes this distinction clear and explains why.

Roblox provides recommendations for games, avatar items, and friends suggestions for users over 18, based on interests and activity.¹¹

[Explanation about compliance redacted, as it relates to RFIs sent to other services and is not relevant to Roblox, which did not receive the RFI]

Ofcom's expectation 3

Greater transparency on risk assessments

Effective engagement with online safety regulation requires transparency with the regulator about major changes and the risks that they pose. From now on, we will expect supervised services to notify Ofcom that they have, as required by law, updated their risk assessment before they deploy any significant service update. We will formally request updated risk assessments from any service where we become aware of significant changes that may impact on child safety to ensure compliance with this duty.

In the Press Release:

An end to product testing on children. New AI tools are launched regularly and widely used by children, without parents knowing they have been tested for safety. This cannot continue. We expect platforms to notify Ofcom that they have, as required by law, assessed the risk of significant updates before they are deployed.

We share Ofcom's objective of ensuring that children are not used to test un-assessed products, particularly AI tools. Our internal processes do account for AI risks in our risk assessments before significant launches or before a product significant change.

Roblox has established a structured Trust by Design (TbD) process to review projects according to four different pillars: Safety, Legal, Information Security and External Relations. [Explanation

¹¹ [Recommendations and Ranking on Roblox](#)

about our process has been redacted, as it contains commercially sensitive details related to internal processes].

We will continue to comply with our statutory duties to update illegal-harms and children's risk assessments before significant launches and significant changes, and will endeavour to notify Ofcom when the threshold is met despite that not being a requirement under the OSA.

Importantly, and on the transparency point, we have already chosen to brief Ofcom in advance on material product changes. For example, we explained our new face age-check technology and the Roblox Kids initiative to Ofcom several months before launch, even though there is no legal duty to notify Ofcom in this way. We see this as part of a constructive, good-faith relationship rather than a requirement imposed by the legislation.

Ofcom's expectation**Effectively apply minimum age restrictions**

Finally, we expect services to apply their own policies on minimum age, using highly effective age assurance. Our own research shows that many of the services most used by children have no effective barriers to underage use. We expect services to take robust measures, including HEAA, to identify and protect children from harm. This position is supported by the Information Commissioner's Office, which has published an open letter setting out its expectations on protecting children younger than 13 on social and video-sharing platforms by implementing robust age assurance measures

In the Press Release:

Effective minimum-age policies. Ofcom research shows that widespread minimum age policies of 13 are still not being properly enforced by tech companies, with 72% of children aged 8-12 accessing their sites and apps.[2] Despite not being explicitly required by the Online Safety Act, we are calling on platforms to do this, using highly effective age assurance.[3]

After reading the full Press Release, the First Letter, the Second Letter and joint statement from ICO and Ofcom on age assurance it became clear that this expectation and wording "Keep underage children off your platforms, Ofcom tells tech firms" was not directed at us. In our view, this expectation is only aimed at services that do not allow children under 13 on their platform at all.



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Our service is intentionally designed for children and their parents and caregivers rather than as a solely 13+ environment. Children can register in Roblox by providing their date of birth, choosing a user name and a password and clicking on “Sign Up.”¹²

Ofcom’s Press Release (footnote 2) correctly notes that Roblox’s stated minimum age is 5. Children under 5 do not see birthday options for their age when setting up an account on Roblox. This reflects our view that children younger than five are still developing the cognitive skills and coordination needed to fully enjoy Roblox³², and that it is in practice unlikely that a child under five could independently complete the sign-up form in a way that bypasses this self-declaration.

Roblox has always been transparent that our community includes younger players and developers, and that we design the service to be safe and fun for children, not to exclude them.¹³

Because under 13 children are welcome in Roblox, parents and caregivers can link their account to their child’s account. Parental involvement is built into Roblox. Parents and caregivers can consent to Roblox Terms of Use and choose content maturity level, chat and friends, screen time and spending.¹⁴

As mentioned above, we’re introducing two new age-based accounts for younger users on Roblox: Roblox Kids for users ages 5 to 8 and Roblox Select for users ages 9 to 15. When they roll out in early June, these accounts will more closely align content access, communication settings, and parental controls with a user’s age.¹⁵ As mentioned in the cover letter, we’re planning a Roblox Newsroom blog post for May 2026, where we’ll explain these accounts in more detail for parents.

¹² [Roblox Terms of Use](#) ³²

[How do I change my age?](#)

¹³ [Safety Features: Chat, Privacy & Filtering](#)

¹⁴ [Parental controls](#)

¹⁵ [Roblox Introduces New Age-Based Accounts and Expanded Parental Controls for Users Under 16](#)