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**From:** s 22  
**Sent:** Tuesday, 7 January 2025 4:52 AM  
**To:** Julie Inman Grant  
**Cc:** s 22; eSafety Commissioner; s 22  
**Subject:** Re: s 22 thanks for meeting with me! [SEC=OFFICIAL]

Happy New Year, Julie and All!

I hope you all had a relaxing break and precious time with your families.

Thank you for sending the note, and I'm grateful for the time you spent meeting up at the FOSI conference. I greatly appreciate and respect your perspectives and thought leadership and I'm looking forward to helping build up more civility education initiatives in Australia next year.

s 22 and I will be planning a trip to meet with new potential civility partners in the first half of this year, and I hope that our schedules will align so that we can meet up. If you or your team have anyone that we should start engaging with, we would appreciate any suggestions.

In the meantime, be well and I look forward to reconnecting soon.

Kind regards,

s 22

s 22

970 Park Place, San Mateo, CA 94403

On Mon, Dec 23, 2024 at 3:30 PM Julie Inman Grant s 22 [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Dear s 22

Thank you for taking the time to meet with me on 8 December in Washington DC.

I appreciated the opportunity to share eSafety's progress and priorities, and to learn more about Roblox's recent updates to parental controls and other online safety features.

As you are keenly aware, collaboration between regulators and online platforms is critically important if we are to find sensible and effective safety solutions. Your insights perspectives are invaluable and will inform our approach. We have always appreciated Roblox's commitment, not only to safety and civility, but in embracing Safety by Design.

As noted, we will be working on a safety by design and online gaming project in 2025 and will no doubt be in touch around the social media age restriction bill. To that end, it is worth noting that the first part of that process will include a consultation directed by the Department of Infrastructure,

Transport, Regional Development, Communications and the Arts on the disallowable instrument which determines which platforms will be covered under the scheme. eSafety will be opening up our own consultations on the “reasonable steps” and requirements of companies captured by the schemes in due course.

You can also access the summary we have provided on the legislation and next steps [here](#).

Please don’t hesitate to get in touch if you wish to set up further exchanges or explore other opportunities.

Wishing you a safe and happy holiday season ahead.

Best wishes,  
Julie

**Julie Inman Grant**  
Commissioner

✉ s 22 [REDACTED]

✉ s 22 [REDACTED]

Executive Assistant: [s 22 \[REDACTED\]@esafety.gov.au](#)



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**Subject:** Roblox/eSafety re. Phase 1 RES Standard [SEC=OFFICIAL]  
**Location:** 65 Pirrama Rd (65 Pirrama Rd, Pyrmont New South Wales 2009)

**Start:** Thu 20/02/2025 2:00 PM  
**End:** Thu 20/02/2025 3:00 PM  
**Show Time As:** Tentative

**Recurrence:** (none)

**Meeting Status:** Not yet responded

**Organizer:** s 22 [REDACTED]  
**Required Attendees:** s 22 [REDACTED]

## OFFICIAL

Please call s 22 [REDACTED] when you arrive, he will meet you on the ground floor and escort you up.

Dial-in details for virtual attendees:

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## Microsoft Teams [Need help?](#)

### Join the meeting now

Meeting ID: 477 509 510 25

Passcode: xw3xC34R

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### Dial in by phone

[+61 2 9161 1238,,799453297#](#) Australia, Sydney

[Find a local number](#)

Phone conference ID: 799 453 297#

### Join on a video conferencing device

Tenant key: esafety@m.webex.com

Video ID: 138 647 127 5

[More info](#)

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

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**From:** s 22  
**Sent:** Wednesday, 23 April 2025 4:31 AM  
**To:** s 22  
**Cc:** Julie Inman Grant  
**Subject:** Re: Visiting Australia... [SEC=OFFICIAL]

Hi s 22,

Thanks for getting back to me so quickly. s 22

Unfortunately, I'm headed to Melbourne on Thursday, so it looks like I'll miss her. If there are any times that it turns out that she's free on Wednesday, just let me know, but this is a friendly visit, so by no means imperative.

Thanks,

s 22

s 22

3150 S Delaware St, San Mateo, CA 94403

On Mon, Apr 21, 2025 at 10:42 PM s 22 <s 22 @esafety.gov.au> wrote:

**OFFICIAL**

Hi s 22

I hope you got to have a break over the Easter weekend. Thank you so much for your email to Julie, she is had back-to-back meetings, but I just wanted to come back to you as I know you are probably planning your trip. I will flag your message with Julie.

s 22

Please reach out if I can chase anything up for the workshop or there is anything further I can assist with.

Kind regards

s 22

s 22

Senior Executive Assistant to the eSafety Commissioner

Office of the eSafety Commissioner

🌐 [esafety.gov.au](http://esafety.gov.au)

🔗 s 22



eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

**From:** s 22 [REDACTED]  
**Sent:** Tuesday, 22 April 2025 10:18 AM  
**To:** Julie Inman Grant s 22 [REDACTED] [@eSafety.gov.au>  
\*\*Subject:\*\* Visiting Australia...](mailto:@eSafety.gov.au)

Hi Julie,

I hope you've been well. I just wanted to reach out to let you know that I'm visiting Sydney and Melbourne the week of May 12. I'm hosting some workshops along with s 22 [REDACTED] and Project Rockit with teens and researchers to develop prosocial strategies. I think you and s 22 [REDACTED] may have received a save-the-date for the workshop on May 13th.

On a separate note, I wanted to see if you were around for a purely social visit to meet for a drink or dinner while I'm in town. I trust that with everything going on, things are very busy for you, but I thought I would reach out anyway. Hope to see you soon!

Kind regards,

s 22 [REDACTED]

s 22 [REDACTED]

3150 S Delaware St, San Mateo, CA 94403

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**Subject:** Invitation: eSafety - Roblox Product Demo @ Wed Apr 30, 2025 11:30am - 12:30pm (GMT+10) **s 22** @esafety.gov.au

**Start:** Wed 30/04/2025 11:30 AM  
**End:** Wed 30/04/2025 12:30 PM  
**Show Time As:** Tentative

**Recurrence:** (none)

**Organizer:** **s 22**

**When**

Wednesday Apr 30, 2025 · 11:30am – 12:30pm  
(Australian Eastern Time - Melbourne)

**Guests**

**s 22** - organizer  
**s 22** @esafety.gov.au  
**s 22** @esafety.gov.au  
**s 22** @esafety.gov.au

[View all guest info](#)

**Reply for** **s 22** @esafety.gov.au

Yes	No	Maybe
<a href="#">More options</a>		

[Join Zoom Meeting](#)

[roblox.zoom.us/j/91698996019?pwd...](https://roblox.zoom.us/j/91698996019?pwd...)

ID: 91698996019

passcode: 029884

[Join by phone](#)

(US) [+1 888-788-0099](tel:+18887880099)

passcode: 029884

[0008000505050](tel:+1008000505050)

passcode: 029884

[Join using SIP](#)

[91698996019@zoomcrc.com](mailto:91698996019@zoomcrc.com)

passcode: 029884

[Joining instructions](#)

[Joining notes](#)

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[Zoom for G Suite Add-On Help](#)  
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Meeting host: [s 22](#)

Join Zoom Meeting:

<https://roblox.zoom.us/j/91698996019?pwd=WL8SaJj4zbVEJ7QfzJ7dLWhFTLVnWi.1&jst=2>

Invitation from [Google Calendar](#)

You are receiving this email because you are an attendee on the event.

Forwarding this invitation could allow any recipient to send a response to the organizer, be added to the guest list, invite others regardless of their own invitation status, or modify your RSVP. [Learn more](#)



[Privacy and security](#)

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**From:** Safety by Design **s 47E(d)** @eSafety.gov.au>  
**Sent:** Friday, 16 May 2025 11:03 PM  
**To:** **s 22**  
**Subject:** RE: Request for case study - Safety by Design CSEA Toolkit [SEC=OFFICIAL]

**OFFICIAL**

Dear **s 22**

This is a friendly reminder that the opportunity to provide written feedback on the toolkit closes **COB Friday 16 May**. If you prefer to provide verbal feedback through an online meeting, please let us know as soon as possible. Additionally, we are happy to discuss any assistance or additional time you may need to prepare and submit a case study if you plan to do so.

Kind regards

Industry Insights and Enablement Team

*Note: The Industry Insights and Enablement Team email address has changed. We are now using **s 47E(d)** [@esafety.gov.au](mailto:@esafety.gov.au). For engagement related to eSafety's systemic regulatory regimes, please contact Industry Supervision at **s 47E(d)** [@esafety.gov.au](mailto:@esafety.gov.au).*

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**From:** eSafety Industry Affairs **s 47E(d)** @eSafety.gov.au>  
**Sent:** Monday, 5 May 2025 6:51 PM  
**To:** **s 22**  
**Subject:** Request for case study - Safety by Design CSEA Toolkit [SEC=OFFICIAL]

**OFFICIAL**

Dear **s 22**

We are reaching out to you following the Safety by Design CSEA workshop in December 2024. Since then, we've been working hard to create a toolkit shaped by learnings from the workshop that will highlight the important work industry is doing to combat online CSEA through Safety by Design and encourage its broader adoption. The toolkit will include key information about CSEA, and outline strategies, tactics and practical tools (e.g. checklists) for companies of all sizes to combat the issue.

### **Case studies**

Throughout the toolkit we are seeking to highlight real-world examples that demonstrate how organisations have implemented CSEA interventions.

The format of the case studies will be concise summaries (2-3 paragraphs) that describe:

- The problem addressed (reactively or proactively).
- The steps the company took to design and implement the solution.
- The solution/initiative/intervention.
- Any evaluation or impact measurement associated with the solution/initiative/intervention.
- Any other lessons learned (e.g. expanding a successful intervention across other services).

We would like to collaborate with you to include an example of Roblox's work on creating age-appropriate experiences in particular through default settings and restrictions for children. If you would like to submit a case study, please let us know at your earliest convenience and reply with a case study by **Friday 16 May**.

## Toolkit outline

The core content of the toolkit will include:

- Standard introductory sections (Foreword, Overview, and Terminology).
- Online Child Sexual Exploitation and Abuse (CSEA) (General information, including who it impacts and perpetrators).
- How are online platforms and services used to facilitate OCSEA? (Including a brief section on legal and regulatory obligations).
- The technology industry (information about what the tech industry are currently doing, barriers industry face, and a focus on cross-platform challenges).
- Opportunities to prevent, detect and disrupt OCSEA going forward: a Safety by Design approach (information about emerging tech and priority areas, reporting workflows, cultural shifts, end-to-end encryption and AI).

The planned practical tools include:

- Tool A: Applying Safety by Design Principles in the prevention, disruption and detection of CSEA
- Tool B: Law enforcement reporting template (Australia, US)
- Tool C: Guidance for start-ups
- Tool D: CSEA risk checklist for product, service and features
- Tool E: Case Studies: examples of Safety by Design approaches to combat CSEA
- Tool F: Referenced and other resources

We are collecting a variety of case studies and those included in the final product may be subject to change. Please also note that you will receive **separate email seeking feedback** on the toolkit generally.

Should you have any questions, please do not hesitate to ask.

## Industry Insights and Enablement



eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

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**From:** Codes  
**Sent:** Thursday, 19 June 2025 11:00 AM  
**To:** **s 22**  
**Cc:** Codes; **s 22**  
**Subject:** RE: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material) [SEC=OFFICIAL]  
**Attachments:** 20150619 - Letter to Roblox.pdf

**OFFICIAL**

Dear **s 22**,

Please find attached correspondence from **s 22**

Kind regards

**s**  
eSafety | Industry Codes and Standards



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**From:** **s 47E(d)** @eSafety.gov.au  
**Sent:** Sunday, 8 June 2025 1:50 PM  
**To:** **s 22**; **s 47E(d)** @eSafety.gov.au  
**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material) [SEC=OFFICIAL]

Dear **s 22**

Thank you for this. Just confirming receipt. We'll consider and come back to you with any follow up.

Kind regards,

**s 22**

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**From:** **s 22**  
**Sent:** Saturday, June 7, 2025 11:05  
**To:** **s 47E(d)** @eSafety.gov.au  
**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material) [SEC=OFFICIAL]



s 47G(1)

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**From:** Codes  
**Sent:** Monday, 23 June 2025 8:46 AM  
**Cc:** Codes  
**Subject:** Correspondence from the eSafety Commissioner - Codes and Standards (Class 1)  
[SEC=UNOFFICIAL]

Dear all,

As you are aware the *Online Safety (Relevant Electronic Services— Class 1A and Class 1B Material) Industry Standard 2024* and the *Online Safety (Designated Internet Services— Class 1A and Class 1B Material) Industry Standard 2024* (the **Standards**) were registered on 21 June 2024 and commenced on 22 December 2024. Five industry codes in relation to Class 1A and Class 1B material have also been in force since 16 December 2023, with another commencing on 12 March 2024 (the **Codes**).

eSafety stated in its [regulatory guidance](#) it would not take enforcement action until six months after commencement of the Standards, other than in exceptional circumstances. This 6-month period was intended to give services additional time to improve their compliance with the Standards. That period has now ended.

eSafety's compliance and enforcement priorities for applicable Industry Codes and Standards for the next six months are:

- i. key 'proactive' obligations, in particular the detection, disruption and deterrence of child sexual abuse material and pro-terror material;
- ii. ensuring user reporting mechanisms are compliant; in particular that they are clear, harm-specific, and reports are actioned appropriately and in a timely manner;
- iii. obligations in relation to generative AI;
- iv. safety by design/safety feature obligations, such as privacy by default settings for children's accounts; and,
- v. ensuring services have sufficient trust and safety resources, and that these possess appropriate skills, experience and qualifications to comply with applicable codes and standards.

While these will guide our prioritisation of matters for enforcement, eSafety may take action in relation to any failure to comply with the industry Codes or the Standards, in particular where there is a risk to the online safety of Australians.

eSafety will continue to proactively monitor compliance, including through use of our investigation and information gathering powers, where appropriate. This may also involve testing of services to ensure certain required features or processes are present and compliant, and/or to ascertain the risks on a service.

In general, and subject to any submissions by providers, eSafety will publish details of enforcement action taken, in the interests of transparency and to ensure specific and general deterrence.

For the avoidance of doubt, receipt of this correspondence does not necessarily communicate any specific compliance concern, but is for the information of a wide range of services.

Your sincerely,



Julie Inman Grant  
eSafety Commissioner



eSafetyCommissioner

eSafety



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**From:** s 22  
**Sent:** Thursday, 26 June 2025 8:04 PM  
**To:** Codes  
**Cc:** s 22  
**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material) [SEC=OFFICIAL]  
**Attachments:** Roblox Letter to eSafety (26 June 2025) - Documented Commitments.pdf

Hi s 22

Please find attached our response to your correspondence of 19 June.

Best,

s 22

**DORI**  
970 Park Place, San Mateo, CA 94403

On Thu, Jun 19, 2025 at 10:59 AM s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Dear s 22,

Please find attached correspondence from s 22

Kind regards

s

eSafety | Industry Codes and Standards



s 47G(1)



s 47G(1)

s 47G(1)

s 47G(1)



s 47G(1)



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**From:** **s 22**  
**Sent:** Tuesday, 8 July 2025 11:52 AM  
**To:** Julie Inman Grant  
**Cc:** **s 47G(1)**  
**Subject:** Ms Inman Grant: Meeting request from Roblox for 3 or 4 September in Sydney  
**Attachments:** 2025\_Roblox\_Meeting\_Request\_Julie\_Inman\_Grant\_.pdf

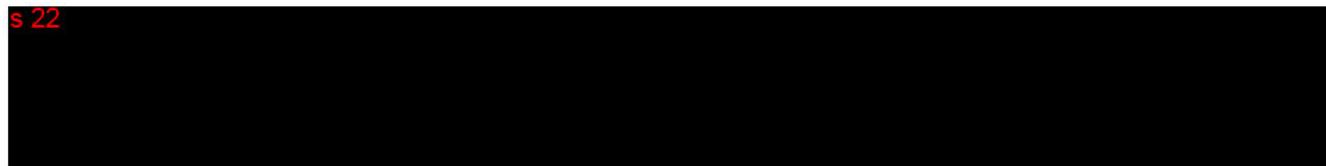
You don't often get email from **s 22** [Learn why this is important](#)

Dear Ms Inman Grant,

Roblox is a global online game platform that brings people together through play, with millions of users worldwide, including in Australia. Roblox will be sending senior executives to Sydney on Wednesday 3 September and Thursday 4 September 2025 and they are seeking a meeting with you.

Roblox's delegation will include:

**s 22**



Please see attached for a formal meeting request on behalf of Roblox. They are seeking meeting with you at your offices at whatever time most suitable for you.

We look forward to hearing from you.

Thank you.

**s 22**



**Let's connect:**  
[Book an online meeting](#) | [Schedule a coffee meeting](#)



corp.roblox.com

970 Park Place  
San Mateo, CA  
94403

8 July 2025

Ms Julie Inman Grant  
eSafety Commissioner  
The Office of eSafety

Via: **s 22** [@esafety.gov.au](mailto:@esafety.gov.au)

**ROBLOX PUBLIC POLICY: MEETING REQUEST**

Dear Ms Inman Grant,

We write to you to seek a meeting to discuss Roblox's operations in Australia. We appreciated the opportunity to meet with you last year, and we would welcome the opportunity to continue our conversation and provide updates on our ongoing efforts to ensure a safe and positive experience for our Australian community.

Roblox works collaboratively with governments around the world to create experiences that protect the safety of its users and the Australian Government is no exception. Senior members of our global public policy team will be visiting Australia and are available to meet with you in person in Sydney on **Wednesday 3 September or Thursday 4 September 2025** at whatever time suits your schedule.

Our delegation will include:

**s 22**

**s 22**

[REDACTED] is the liaison for coordinating the meeting. Thank you for your consideration of this request, and we look forward to a meaningful discussion with you again.

Regards,

**s 22**



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**From:** [REDACTED] s 22  
**Sent:** Monday, 21 July 2025 8:15 AM  
**To:** [REDACTED] s 22  
**Cc:** Codes; [REDACTED] s 22  
**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material) [SEC=OFFICIAL]

Hi [REDACTED] s 22,

[REDACTED] s 47G(1) [REDACTED]

We appreciate eSafety's engagement and genuinely value the open dialogue. Thanks again.

Best,

[REDACTED] s 22

[REDACTED]  
970 Park Place, San Mateo, CA 94403

On Wed, Jul 9, 2025 at 3:02 PM [REDACTED] s 22 <[@esafety.gov.au](mailto:@esafety.gov.au)> wrote:

**OFFICIAL**

Dear [REDACTED] s 22

[REDACTED] s 47G(1)

s 47G(1)



Regards

s 22

---

**From:** s 22  
**Sent:** Thursday, 26 June 2025 8:04 PM  
**To:** s 47E(d) [@eSafety.gov.au](mailto:@eSafety.gov.au)  
**Cc:** s 22 [@esafety.gov.au](mailto:@esafety.gov.au); s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au);  
s 22  
**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material)  
[SEC=OFFICIAL]

Hi s 22

Please find attached our response to your correspondence of 19 June.

Best,

s 22

--

s 22

[REDACTED]  
970 Park Place, San Mateo, CA 94403

On Thu, Jun 19, 2025 at 10:59 AM Codes <[s 47E\(d\) @esafety.gov.au](#)> wrote:

**OFFICIAL**

Dear s 22 ,

Please find attached correspondence from s 22

Kind regards

s 22

eSafety | Industry Codes and Standards



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**From:** Codes <[s 47E\(d\) @esafety.gov.au](#)>

**Sent:** Sunday, 8 June 2025 1:50 PM

**To:** s 22 <[s 47E\(d\) @esafety.gov.au](#)>

**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material)  
[SEC=OFFICIAL]

Dear s 22 ,

Thank you for this. Just confirming receipt. We'll consider and come back to you with any follow up.

Kind regards,

s 22

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**From:** s 22

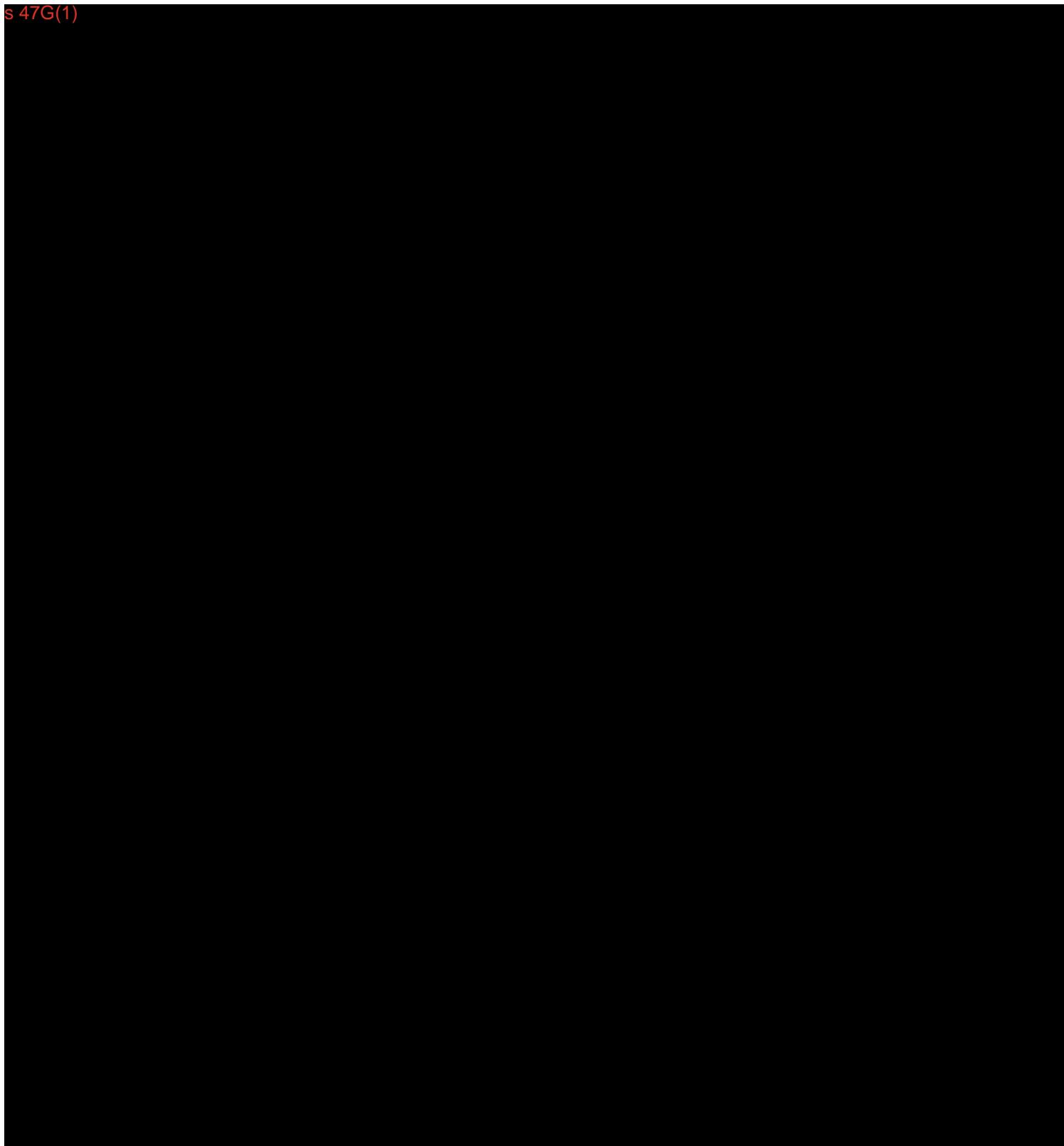
**Sent:** Saturday, June 7, 2025 11:05

**To:** s 47E(d) [@eSafety.gov.au](mailto:@eSafety.gov.au)

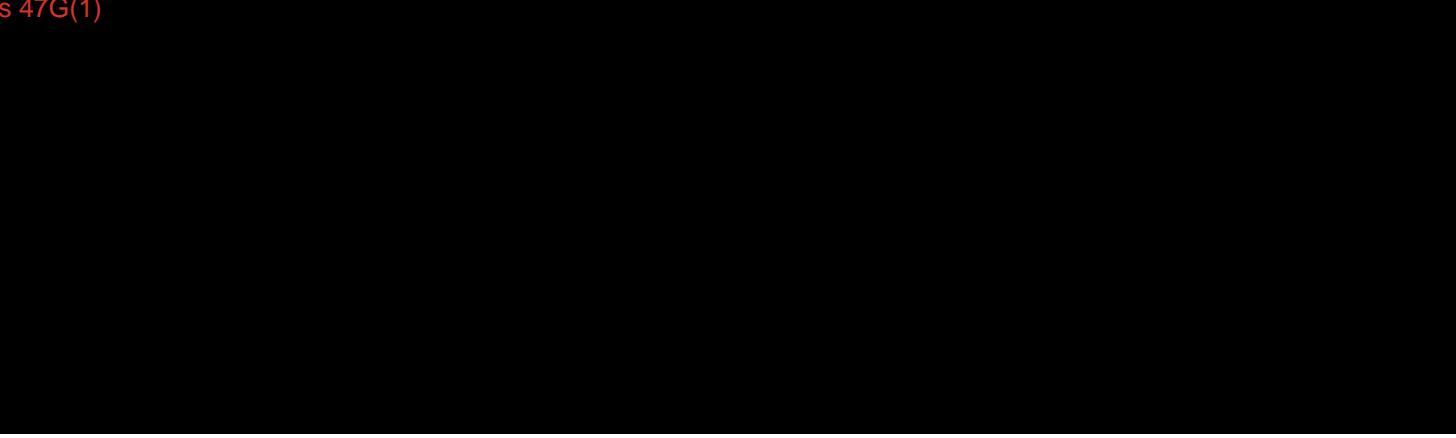
**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material) [SEC=OFFICIAL]

Hi s 22,

s 47G(1)



s 47G(1)



Best,

s 22

--

s 22



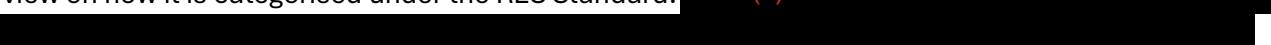
970 Park Place, San Mateo, CA 94403

On Wed, May 21, 2025 at 9:49 AM Codes s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Dear s 22 ,

Thank you to you and the team for the product demo, and for your correspondence setting out Roblox's view on how it is categorised under the RES Standard. s 47G(1)



s 47G(1)



**s 47G(1)**

Kind regards,

**s 22**

**s 22**

## Manager, Codes and Standards (Class 1)

## Industry Compliance and Enforcement

s 22

From: s 22

**Sent:** Friday, 9 May 2025 5:21 PM

To: **s 47E(d)** @eSafety.gov.au>

**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material)  
[SEC=OFFICIAL]

His 22

As promised, coming back on the points from our meeting last week.

s 47G(1)

Category	Magnitude
0	1
1	5
2	10
3	20
4	5
5	2
6	1
7	5
8	10
9	20

We hope this is helpful. Please let us know if you have any questions or would like to discuss. Thank you.

s 22

--

s 22

[REDACTED]

[REDACTED]

 970 Park Place, San Mateo, CA 94403

On Fri, May 2, 2025 at 4:23 PM s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Thanks s 22 Likewise to you and the team – it was a useful discussion.

That sounds good re your response, thanks.

Have a good weekend

s 22

**From:** s 22

**Sent:** Friday, 2 May 2025 4:19 PM

**To:** s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au)

**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material)  
[SEC=OFFICIAL]

Hi s 22

Thanks again to you, s 22 and the eSafety team for the session on Wednesday. We hope you found the demo useful.

In terms of our response timing, we're aiming to come back to you by the end of next week.

Best,

s 22

--

s 22

[REDACTED]

[REDACTED]

 970 Park Place, San Mateo, CA 94403

On Tue, Apr 29, 2025 at 3:33 PM s 22 wrote:

Hi s 22

That's great -- thanks for letting us know. Looking forward to it tomorrow.

Best,

s 22

[REDACTED]

[REDACTED]



970 Park Place, San Mateo, CA 94403

On Mon, 28 Apr 2025 at 1:50 pm, s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Hi s 22

Looking forward to meeting on Wednesday. Just wanted to confirm attendees on our end – we will have:

s 22 [REDACTED] from last time, plus  
s 22 [REDACTED] from our legal team.

Another of our lawyers (s 22 [REDACTED]) has a conflict but would like to jump in if his meeting wraps up in good time.

Cheers

s 22

[REDACTED]

Senior Advisor - Industry Codes and Standards (Phase 1)

s 22

Mon-Thurs (8am-4pm)

**From:** s 22 [REDACTED]  
**Sent:** Wednesday, 16 April 2025 4:57 PM  
**To:** s 47E(d) [@eSafety.gov.au>  
\*\*Subject:\*\* Re: Implementation of the Relevant Electronic Services Standard \(Class 1A and Class 1B Material\)  
\[SEC=OFFICIAL\]](mailto:@eSafety.gov.au)

Hi s 22 ,

Just circling back on this, Wednesday 30 April at 11.30am works for our team in California -- let me send through a calendar invite. From our side, it will be the same group as last time (s 22 [REDACTED]

[REDACTED] Thank you.

Best,

s 22

--

s 22

  
[970 Park Place, San Mateo, CA 94403](http://970 Park Place, San Mateo, CA 94403)

On Mon, Apr 14, 2025 at 4:01 PM s 22  wrote:

Hi s 22 ,

Sounds good -- let me confirm with California and come back to you in the next day or so. Thank you.

Best,

s 22

--

s 22

  
[970 Park Place, San Mateo, CA 94403](http://970 Park Place, San Mateo, CA 94403)

On Mon, Apr 14, 2025 at 11:06 AM s 47E(d)  [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Hi s 22 ,

How about the week after, Wednesday 30 April or Thursday 1 May? We will have more on deck then from our side.

Cheers

s 22

A/g Manager - Industry Codes and Standards (Phase 1)

s 22

Mon-Thurs (8am-4pm)

**From:** s 22

**Sent:** Monday, 14 April 2025 9:10 AM

**To:** s 47E(d) [@eSafety.gov.au](mailto:@eSafety.gov.au)

**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material)  
[SEC=OFFICIAL]

Hi s 22

We are having some availability issues with our Product team in California for the demo this week. Sorry for the inconvenience but we were hoping you can accommodate the same time next Wednesday, April 23 (11.30am) or Thursday, April 24 at 11am instead? I'm conscious it's a short week with our Easter and Anzac Day public holidays so please let me know if either time won't work for eSafety and we can arrange something that does.

I can send through a calendar invite (Zoom) once confirmed. Thank you - appreciate your flexibility.

Best,

s 22

--

s 22

 970 Park Place, San Mateo, CA 94403

On Thu, Apr 3, 2025 at 2:48 PM s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Thanks s 22 ,

I'll pop in a calendar invite if Microsoft Teams or Webex work for your side?

Alternatively if it's easier to use your preferred VC software for the product demo, happy for your side to set it up.

Cheers

s 22

Senior Advisor - Industry Codes (Phase 1)

s 22

Mon-Thurs (8am-4pm)

**From:** s 22  
**Sent:** Wednesday, 2 April 2025 5:37 PM  
**To:** s 47E(d) [@esafety.gov.au>](mailto:@esafety.gov.au)  
**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material)  
[SEC=OFFICIAL]

H s 22 ,

That's great, thanks for confirming and appreciate your flexibility -- 11.30am should work well to accommodate multiple time zones (Australia, Korea, California).

Best,

s 22

--

s 22

[REDACTED]

[REDACTED]

[REDACTED]

 970 Park Place, San Mateo, CA 94403

On Tue, Apr 1, 2025 at 2:07 PM s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Hi s 22 ,

16 April works well for us – we would prefer to go fully remote as our team is scattered across cities. 11:30am works well but equally we are happy to go earlier if that suits your California colleagues better?

Cheers

s 22

[REDACTED]

Senior Advisor - Industry Codes (Phase 1)

s 22

Mon-Thurs (8am-4pm)

From: s 22

Sent: Tuesday, 1 April 2025 12:31 PM

To: s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au)

Cc: s 22 [@esafety.gov.au](mailto:@esafety.gov.au)

Subject: Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material) [SEC=OFFICIAL]

Hi s 22

Thanks again for the information in your 26 Feb email.

As a next step, we think it would be useful if we proceed to arrange a Roblox product demo for eSafety. We'll aim to make the demo specific to the points raised in your email and think a deep dive on our functionality may be helpful.

I'm travelling again internationally this week so w/c 14 April may be best if that suits you and the eSafety team -- if so, how are you placed on Wednesday 16 April at say 11.30am? We can attend your office in Sydney with our Product team at HQ in California joining remotely. Thank you.

Best,

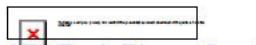
s 22

--

s 22

[REDACTED]

[REDACTED]



[970 Park Place, San Mateo, CA 94403](http://970 Park Place, San Mateo, CA 94403)

On Mon, Mar 10, 2025 at 10:30 AM s 22 wrote:

Hi s 22

Thanks for your email. We appreciate the additional information and are looking at it in more detail.

Just to say, I'm travelling internationally this week for 10 days.

We are targeting w/c March 24 to come back to you, including to coordinate with HQ to arrange a product demo for eSafety post my return to Australia.

Best,

s 22

--

s 22

[REDACTED]

[REDACTED]



[970 Park Place, San Mateo, CA 94403](http://970 Park Place, San Mateo, CA 94403)

On Wed, Feb 26, 2025 at 2:53 PM s 47E(d) <[@esafety.gov.au](mailto:@esafety.gov.au)> wrote:

**OFFICIAL**

Dear s 22

Thanks to you, s 22 for the meeting last week, and in particular to s 22 for flying over for it. We appreciated the discussion on the Phase 1 industry codes and standards (focussed on 'Class 1' material such as child sexual exploitation and abuse) under the [Online Safety Act](#) (the Act).

s 47G(1)



Kind regards,

s 22 [REDACTED]

Senior Advisor - Industry Codes (Phase 1)  
s 22 [REDACTED]

Mon-Thurs (8am-4pm)

**From:** s 22 [REDACTED]  
**Sent:** Thursday, 13 February 2025 3:09 PM  
**To:** s 47E(d) [@eSafety.gov.au>  
\*\*Cc:\*\* s 22 \[REDACTED\] \[@eSafety.gov.au>  
\\*\\*Subject:\\*\\* Re: Implementation of the Relevant Electronic Services Standard \\(Class 1A and Class 1B Material\\) \\[SEC=OFFICIAL\\]\]\(mailto:@eSafety.gov.au\)](mailto:@eSafety.gov.au)

Hi s 22 [REDACTED]

That's great -- thank you. Also attending on our side is:

- s 22  
[REDACTED]

See you then.

s 22

--

s 22  
[REDACTED]

[REDACTED]

 970 Park Place, San Mateo, CA 94403

On Wed, Feb 12, 2025 at 1:41 PM s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Hi s 22

Thursday 20 February at 2pm is great for us.

On our side we'll have s 22

[REDACTED] there in person. I am Melbourne-based so will dial in.

I'll send through an invitation shortly with contact details to help get you into the building. Can you please let us know if anyone else is coming on your end, so our reception staff can organise passes?

Cheers

s 22

[REDACTED]

Senior Advisor - Industry Codes (Phase 1)

s 22

Mon-Thurs (8am-4pm)

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**From:** s 22

**Sent:** Wednesday, February 12, 2025 12:17 PM

**To:** s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au)

**Cc:** s 22 [@esafety.gov.au](mailto:@esafety.gov.au)

**Subject:** Re: Implementation of the Relevant Electronic Services Standard (Class 1A and Class 1B Material) [SEC=OFFICIAL]

Hi **s 22**,

Just coming back on this -- thanks for your patience.

We would like to propose an in-person meeting to discuss in more detail. We are happy to attend your office in Sydney.

Would Thursday 20 February (next week) work for the e-Safety team at say 2pm? Thank you.

**s 22**

--

**s 22**

[REDACTED]

[REDACTED]



[970 Park Place, San Mateo, CA 94403](mailto:970 Park Place, San Mateo, CA 94403)

On Wed, Jan 29, 2025 at 5:01 PM **s 22** wrote:

Hi **s 22**

Thanks for your email.

We were grateful for the opportunity to participate in the Joint Council workshop last year -- looking forward to seeing the outputs.

Just a courtesy note to let you know that we'll come back to you on this. We have some APAC folks off this week for Lunar New Year.

**s 22**

--

**s 22**

[REDACTED]

[REDACTED]



[970 Park Place, San Mateo, CA 94403](mailto:970 Park Place, San Mateo, CA 94403)

On Tue, Jan 28, 2025 at 1:46 PM **s 47E(d)** <[@esafety.gov.au](mailto:@esafety.gov.au)> wrote:

**OFFICIAL**

Dear **s 22**

Thank you to you and your colleagues at Roblox for your continued engagement with eSafety, including at the FOSI Conference and Joint Council workshop last year.

We wanted to touch base regarding the Phase 1 [Codes and Standards](#) (Class 1A and Class 1B Material) in relation to Roblox, now that the industry standard for [relevant electronic services](#) (RES Standard) is in force. We are keen to understand the approach Roblox is taking to compliance.

The ‘safety features and settings’ requirements (section 18) are an early priority for eSafety, and so in the first instance we would find it helpful to understand Roblox’s plans relating to their implementation.

This section includes requirements on providers that allow ‘young Australian children’ (defined as Australian children under 16) to become account holders or end-users. In particular, the RES Standard requires that providers have tools and settings that prevent end-users who are over 18 from using the service to contact a young Australian child without the consent of the child’s parent or carer, and requires accounts of young Australian children to be private by default.

s 47G(1)



We are also happy to discuss Roblox’s obligations more generally.

Kind regards,

s 22



Senior Advisor - Industry Codes (Phase 1)

Mon-Thurs (8am-4pm)



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**From:** **s 22**  
**Sent:** Tuesday, 12 August 2025 1:00 PM  
**To:** **s 22**  
**Cc:** **s 22**  
**Subject:** RE: Meeting Request: In-Person Briefing and Product Demo with Roblox Executives (13 or 14 August) [SEC=OFFICIAL]

**OFFICIAL**

Awesome thank you! looking forward to meeting you then **s 22**

**s 22**  
Executive Officer  
Office of the eSafety Commissioner

 [esafety.gov.au](http://esafety.gov.au)  
 **s 22**



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**From:** **s 22**  
**Sent:** Tuesday, 12 August 2025 12:38 PM  
**To:** **s 22** [@esafety.gov.au  
\*\*Cc:\*\* \*\*s 22\*\*  
\*\*Subject:\*\* Re: Meeting Request: In-Person Briefing and Product Demo with Roblox Executives \(13 or 14 August\) \[SEC=OFFICIAL\]](mailto:@esafety.gov.au)

Hi **s 22**, can we book in 12pm Wed pls?

I have copied **s 22** who will be with the Roblox team on Wednesday.

Thank you.

**s 22**

Sent from my iPhone

---

**From:** s 22 [@esafety.gov.au>](mailto:@esafety.gov.au)

**Sent:** Tuesday, August 12, 2025 12:24:28 PM

**To:** s 22

**Subject:** FW: Meeting Request: In-Person Briefing and Product Demo with Roblox Executives (13 or 14 August)  
[SEC=OFFICIAL]

**OFFICIAL**

Hi s 22

I am so sorry but our Minister has requested at meeting at 11am on 20 August now.

As per my email with s 22 (I completely understand the time difference) I am wondering if we can push this meeting out slightly. Would it be possible to do 12pm and I can extend to 1 hour for Julie and 1.5 for team?

We could also now do Thursday 21 August face to face at 10.30am – 11.30am.

I completely understand that organising this must be incredibly tricky and if it was anything else we would decline but unfortunately we need to accept the meeting with the Minister.

Kind regards

s 22

s 22

Executive Officer

Office of the eSafety Commissioner

 [esafety.gov.au](mailto:esafety.gov.au)

 s 22



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**From:** s 22

**Sent:** Monday, 11 August 2025 12:52 PM

**To:** s 22

**Cc:** s 22

s 22

**Subject:** RE: Meeting Request: In-Person Briefing and Product Demo with Roblox Executives (13 or 14 August) [SEC=OFFICIAL]

**OFFICIAL**

Hi s 22

I hope you had a lovely weekend? Just trying to extend this slightly. Would it be possible to do 12pm and I can extend to 1 hour for Julie and 1.5 for team?

We could also now do Thursday 21 August face to face at 10.30am – 11.30am.

Sorry the diary is crazy at the moment.

Kind regards

s 22

Executive Officer  
Office of the eSafety Commissioner

 [esafety.gov.au](http://esafety.gov.au)  
 s 22



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**From:** s 22  
**Sent:** Thursday, 7 August 2025 9:09 AM  
**To:** s 22 <[@esafety.gov.au](mailto:@esafety.gov.au)>  
**Cc:** s 22

**Subject:** Re: Meeting Request: In-Person Briefing and Product Demo with Roblox Executives (13 or 14 August) [SEC=OFFICIAL]

Hi s 22 ,

Thank you for exploring the possibility of extending our meeting; your effort is greatly appreciated.

Could you please provide an update on whether Julie's team would be able to remain for the entirety of the briefing, as you previously suggested?

We understand that Julie may need to depart after 45 minutes, and it is important to us that her team is fully informed to brief her effectively.

Thank you once again for your assistance.

Sincerely,

s 22

---

ROBLOX

s 22

2025년 8월 7일 (목) 07:56, s 22 [@esafety.gov.au](mailto:@esafety.gov.au) 님이 작성:

**OFFICIAL**

Hi s 22

Thank you so much, unfortunately Julie's schedule is absolutely packed so this was all the time we could find I am afraid. So she only has 45 minutes.

Many thanks for understanding.

Kind regards

s 22

Executive Officer  
Office of the eSafety Commissioner

 [esafety.gov.au](http://esafety.gov.au)

 s 22



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From: **s 22**

Sent: Wednesday, 6 August 2025 2:41 PM

To: **s 22** [@esafety.gov.au](mailto:@esafety.gov.au)

Cc: **s 22**

**Subject:** Re: Meeting Request: In-Person Briefing and Product Demo with Roblox Executives (13 or 14 August)  
[SEC=OFFICIAL]

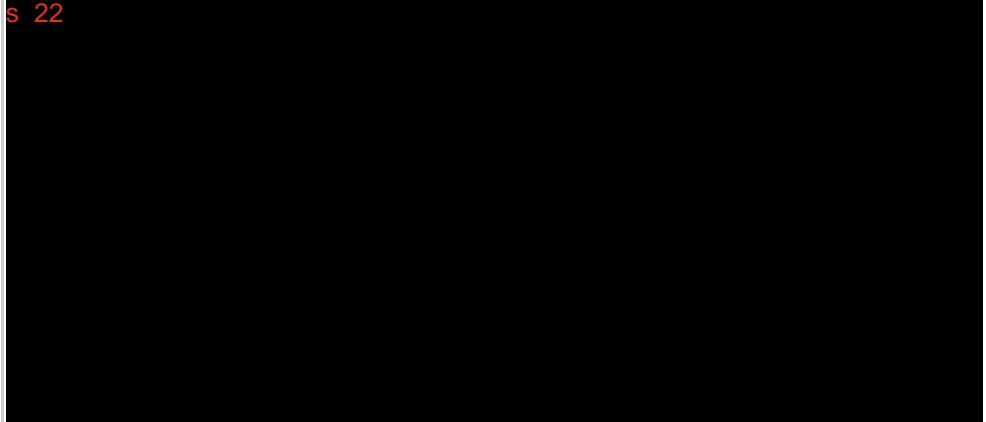
Hi **s 22**

Thank you for your valuable suggestion. Ideally, we would appreciate Julie's presence for the entire meeting. However, should her schedule not permit this, we would be grateful for the opportunity to brief her team, who could then relay the information to her.

We appreciate your understanding and flexibility in this matter.

Best,

**s 22**



2025년 8월 5일 (화) 21:07, **s 22** [@esafety.gov.au](mailto:@esafety.gov.au)님이 작성:

**OFFICIAL**

Hi **s 22**

Thank you so much and completely understand there is a lot to cover. Unfortunately, Julie is really stretched that week and has back to backs. I will chat with her about it but in the interim I could extend out the meeting and Julie may have to leave but the team could stay to hear the full briefing and then brief her?

I am sorry about that, somehow the diary has become very full up until the end of the year.

Thanks for all your help!

Kind regards

**s 22**

Executive Officer  
Office of the eSafety Commissioner



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From: s 22

Sent: Tuesday, 5 August 2025 11:21 AM

To: s 22 <[@esafety.gov.au](mailto:@esafety.gov.au)>

Cc: s 22

Subject: Re: Meeting Request: In-Person Briefing and Product Demo with Roblox Executives (13 or 14 August)  
[SEC=OFFICIAL]

Hi s 22

Thank you for your invaluable support in scheduling this meeting. We're pleased to confirm that Wednesday, August 20th at 11:30 AM works well for us.

During our meeting with Julie, we plan to discuss our in-experience chat function and highlight key safety features that could be implemented in Australia. To fully accommodate a product solution demonstration, we would be grateful if the meeting could be extended to 1.5 hours.

We understand that this is a significant request given Julie's busy schedule. However, we believe that walking through our platform's features aligns well with her vision for Safety by Design and would be mutually beneficial.

Thank you again for your assistance.

Best,

s 22

A large black rectangular area redacting the end of the email body.

2025년 8월 5일 (화) 07:06, s 22 <[@esafety.gov.au](mailto:@esafety.gov.au)>님이 작성:

OFFICIAL

Hi s 22

Absolutely no worries, would 11.30am on Wednesday 20 work?

I can send a calendar invite.

We are located [65 Pirrama Road Pyrmont](#) on arrival you can call me, and I can take you to level 5 to meet Julie and the team.

We will look forward to meeting you then but please reach out if I can do anything in the interim.

Kind regards

s 22

Executive Officer  
Office of the eSafety Commissioner

 [esafety.gov.au](http://esafety.gov.au)

 s 22



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From: s 22

Sent: Monday, 4 August 2025 10:11 PM

To: s 22

Cc: s 22 [@esafety.gov.au](mailto:@esafety.gov.au); s 22

s 22

[@eSafety.gov.au](mailto:@eSafety.gov.au); s 22

[@esafety.gov.au](mailto:@esafety.gov.au)

Subject: Re: Meeting Request: In-Person Briefing and Product Demo with Roblox Executives (13 or 14 August)  
[SEC=OFFICIAL]

Hi s 22

It seems there was a slight mismatch in the days and dates from our previous emails. The corrected times are as follows:

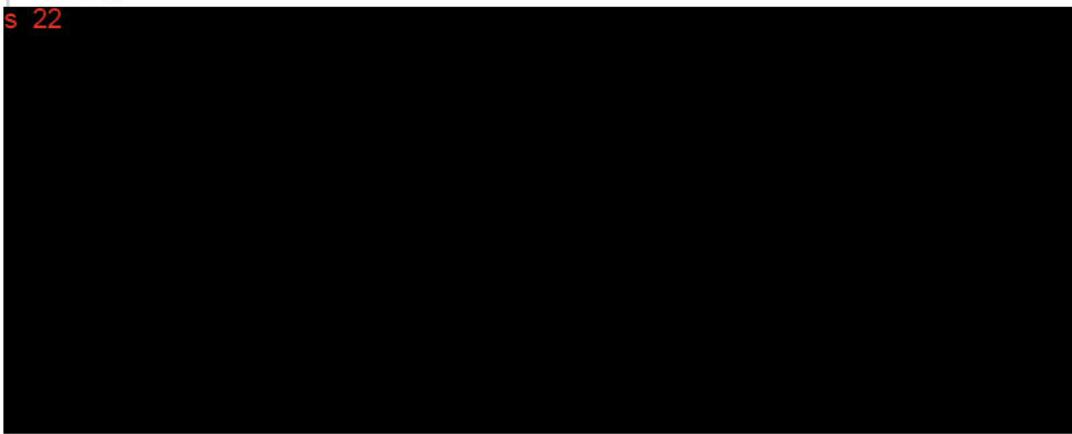
- **Wednesday, August 20th:** between 11 AM and 2 PM or after 3 PM (face-to-face)
- **Thursday, August 21st:** between 11 AM and 1 PM (virtual)
- **Friday 21 August:** between 8 AM and 10:30 AM

Would Julie be available to meet face-to-face in Sydney with s 22 and the team on Wednesday, August 20th?

Thank you so much for all your help.

Best,

s 22



2025년 8월 4일 (월) 20:42, s 22

님이 작성:

Hi s 22,

Many thanks for your help with this. Could we tentatively confirm Wednesday, the 19th, and we will formally confirm in a few hours? Thank you so much again.

Warmly,

s 22

On Mon, Aug 4, 2025 at 2:46 AM s 22 [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Hi s 22

Just circling back to see if we might be able to assist with dates. Julie will be in Sydney on W/C 18 of August if that might suit at all?

Julie could do the following:

Monday 18 August – 3.30pm onwards (face to face)

Wednesday 19 August – between 11am and 2pm or after 3pm (face to face)

Thursday 20 August – between 11am – 1pm (virtual)

Friday 21 August – between 8am – 10.30am.

I understand the team may have to do virtually (and there might be a time zone component) please let me know and I will find some alternative times that fit US time zones.

Thank you so much

Kind regards

s 22

Executive Officer  
Office of the eSafety Commissioner

 [esafety.gov.au](http://esafety.gov.au)

 s 22



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From: s 22

Sent: Wednesday, 30 July 2025 5:44 PM

To: s 22 [@esafety.gov.au](mailto:@esafety.gov.au)

Cc: Julie Inman Grant s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au); s 22

s 22

[@eSafety.gov.au](mailto:@eSafety.gov.au); s 22 [@esafety.gov.au](mailto:@esafety.gov.au)

Subject: Re: Meeting Request: In-Person Briefing and Product Demo with Roblox Executives (13 or 14 August)  
[SEC=OFFICIAL]

Thanks very much, s 22, for the swift reply. We appreciate it. Would any other dates in August work? They are also free 8/26 - 8/28.

Warmest,

s 22

On Wed, Jul 30, 2025 at 12:42 AM **s 22**

[@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Hi **s 22**,

Thank you so for reaching out regarding a potential meeting with Julie on Wednesday 13 August or Thursday 14 August.

Unfortunately, she is interstate in Canberra and Adelaide for speaking engagements.

Please let me know if I can assist in coordinating time with the team in her absence.

Julie regrets missing the opportunity to see **s 22** at this meeting, but she's very much looking forward to reconnecting with you in September.

Kind regards

**s 22**

Executive Officer

Office of the eSafety Commissioner



[esafety.gov.au](http://esafety.gov.au)



**s 22**



Australian Government



eSaf



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From: s 22

Sent: Wednesday, 30 July 2025 5:12 PM

To: Julie Inman Grant s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au)

Cc: s 22

Subject: Meeting Request: In-Person Briefing and Product Demo with Roblox Executives (13 or 14 August)

You don't often get email from s 22 . [Learn why this is important](#)

Hi Julie,

I hope you are well — it was wonderful to meet with you and your team during our last trip to Sydney.

I'm reaching out with a request; we'd very much appreciate an in-person meeting with you on Wednesday 13 August or Thursday 14 August, at a time that suits your schedule.

We are seeking a two hour session to provide an opportunity for two of our C-suite executives, s 22 and s 22 to discuss the nuances of our product and its communications functionality with you.

Over the past months, we have been scoping product solutions with our engineering and safety teams - in particular for our in-experience chat functionality - and believe there are unique aspects of our safety tools and features that could be deployed to provide an even safer experience for Australian users.

We'd like to highlight these as well in a virtual product demo from our s 22

We recognize that this is a significant time commitment, but if you're willing we believe it would be a valuable opportunity to walk through the platform's features and answer any questions in detail.

The meeting would be attended by the following Roblox executives:

s 22

We are flexible on location, and happy to meet at your office or another venue that works best.

If two hours is not feasible in a single block, we would be pleased to explore alternative formats or split the session across two shorter meetings.

Please let us know what might be possible.

Sending my best wishes,

**s 22**

**s 22**

[970 Park Place, San Mateo, CA 94403](http://970 Park Place, San Mateo, CA 94403)



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**From:** s 22  
**Sent:** Friday, 22 August 2025 3:21 PM  
**To:** s 22  
**Subject:** RE: Meeting yesterday [SEC=OFFICIAL]

**OFFICIAL**

Thanks s 22 Sounds good. Have a good weekend

s 22

---

**From:** s 22  
**Sent:** Friday, 22 August 2025 11:19 AM  
**To:** s 22 @eSafety.gov.au>  
**Cc:** s 22 @eSafety.gov.au>; s 47E(d) @eSafety.gov.au>  
**Subject:** Re: Meeting yesterday [SEC=OFFICIAL]

Hi s 22 ,

Likewise, thanks from our end - we appreciated the opportunity to share more with s 22  
out from California as part of the discussion. I'll respond to Julie's email shortly.

s 47G(1)

Best,

s 22

  
970 Park Place, San Mateo, CA 94403

On Thu, Aug 21, 2025 at 10:01 AM s 22 <[@esafety.gov.au](mailto:@esafety.gov.au)> wrote:

**OFFICIAL**

Hi s 22 ,

Thanks for the meeting yesterday, and in particular to the team for flying all the way. Julie will also write with her thanks shortly.

s 47G(1)

Thanks,

s 22

[REDACTED]  
a/g Executive Manager

Phase 1 Codes and Standards and BOSE

s 22



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s 22



970 Park Place, San Mateo, CA 94403

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**From:** **s 22**  
**Sent:** Friday, 29 August 2025 4:41 PM  
**To:** **s 22**  
**Subject:** RE: Ms Inman Grant: Meeting request from Roblox for 3 or 4 September in Sydney [SEC=OFFICIAL]

**OFFICIAL**

Hi **s 22**

So lovely to hear from you.

Of course!! I have added **s 22**

We will look forward to seeing you next week.

Kind regards

**s 22**

**[REDACTED]**  
Executive Officer  
Office of the eSafety Commissioner

 [esafety.gov.au](http://esafety.gov.au)  
 **s 22** **[REDACTED]**



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**From:** **s 22**  
**Sent:** Friday, 29 August 2025 4:20 PM  
**To:** **s 22** @esafety.gov.au  
**Subject:** Re: Ms Inman Grant: Meeting request from Roblox for 3 or 4 September in Sydney [SEC=OFFICIAL]

You don't often get email from **s 22** **[REDACTED]**. [Learn why this is important](#)

Good afternoon **s 22**,

It was lovely meeting you last week.

Regarding the meeting with Julie and Roblox on September 3 from 1:00 PM to 2:00 PM, would it be possible to include s 22 at Roblox, on the calendar invite? He would like to attend the meeting virtually if possible.

His email address is s 22.

Please let me know if there are any issues with this request.

Thank you and have a lovely weekend.

s 22

On Wed, 9 Jul 2025 at 09:31, s 22 via s 47G(1)

wrote:

**OFFICIAL**

Hi s 22

Confirming the meeting for 3 September 1pm – 2pm.

Closer to the time if you don't mind sending me details of all the people attending, I can register them in our system.

I will put the details in the calendar invite but we are located at 65 Pirrama Road, if you want to call me on arrival on s 22 I can come and collect you.

Kind regards

s 22

Senior Executive Assistant to the eSafety Commissioner  
Office of the eSafety Commissioner

 [esafety.gov.au](http://esafety.gov.au)

 s 22



eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

---

**From:** [s 22](#)  
**Sent:** Tuesday, 8 July 2025 12:03 PM  
**To:** [s 22](#) [@esafety.gov.au](#); Julie Inman Grant [s 22](#) [@eSafety.gov.au](#)  
**Cc:** [s 47G\(1\)](#)  
**Subject:** Re: Ms Inman Grant: Meeting request from Roblox for 3 or 4 September in Sydney [SEC=OFFICIAL]

Hi [s 22](#), thank you for coming back to me so quickly .

Yes that would be great - I will put a hold in for 1pm to 3.30pm on Wednesday 3 September and will wait for your confirmation upon Julie's return.

Thank you.

**From:** Amy Oram <[Amy.Ormam@esafety.gov.au](mailto:Amy.Ormam@esafety.gov.au)>  
**Date:** Tuesday, 8 July 2025 at 11:59 am  
**To:** [s 22](#) Julie Inman Grant  
[s 22](#) [@esafety.gov.au](#)  
**Cc:** [s 47G\(1\)](#)  
**Subject:** RE: Ms Inman Grant: Meeting request from Roblox for 3 or 4 September in Sydney [SEC=OFFICIAL]

**OFFICIAL**

Dear [REDACTED]  
s 22

Thank you so much for your email to Julie, [REDACTED]  
[REDACTED]

I can see there is availability on Wednesday 3 September between – 1.00pm – 3.30pm if we can pencil something in?

Kind regards

[REDACTED]  
s 22

[REDACTED]  
Senior Executive Assistant to the eSafety Commissioner

Office of the eSafety Commissioner

 [esafety.gov.au](http://esafety.gov.au)

 s 22 [REDACTED]



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— land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

**From:** s 22 [REDACTED]  
**Sent:** Tuesday, 8 July 2025 11:52 AM  
**To:** Julie Inman Grant s 22 [@eSafety.gov.au>](mailto:@eSafety.gov.au)  
**Cc:** s 47G(1) [REDACTED]  
**Subject:** Ms Inman Grant: Meeting request from Roblox for 3 or 4 September in Sydney

You don't often get email from s 22 [REDACTED]. [Learn why this is important](#)

Dear Ms Inman Grant,

Roblox is a global online game platform that brings people together through play, with millions of users worldwide, including in Australia. Roblox will be sending senior executives to Sydney on Wednesday 3 September and Thursday 4 September 2025 and they are seeking a meeting with you.

Roblox's delegation will include:

s 22 [REDACTED]

Please see attached for a formal meeting request on behalf of Roblox. They are seeking meeting with you at your offices at whatever time most suitable for you.

We look forward to hearing from you.

Thank you.

s 47G(1) [REDACTED]

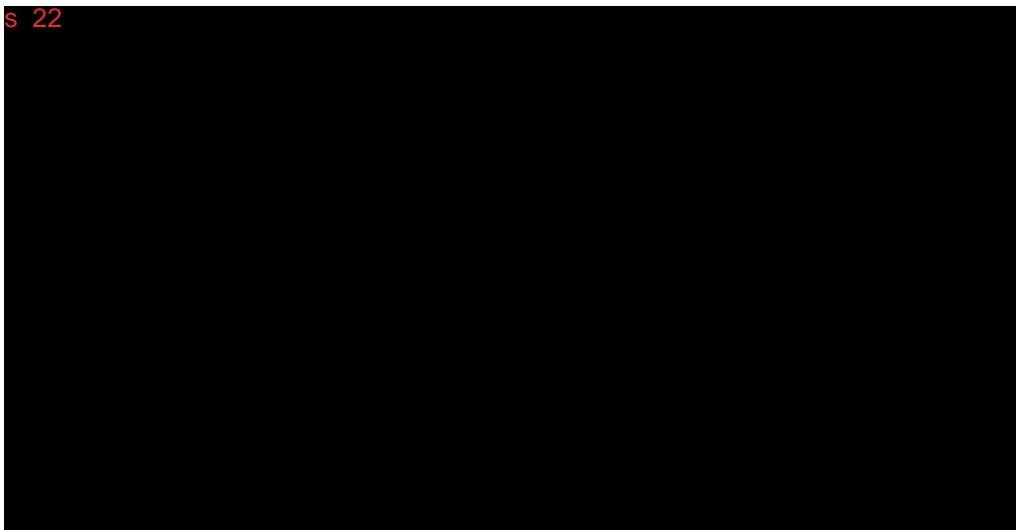
**Let's connect:**

[Book an online meeting](#) | [Schedule a coffee meeting](#)

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s 22



---

**From:** eSafety Commissioner  
**Sent:** Thursday, 4 September 2025 1:46 PM  
**To:** **s 22**  
**Cc:** eSafety Industry Supervision; Social Media Minimum Age Restrictions; **s 22**  
**Subject:** Amended: CC25-0105\_Correspondence from eSafety Commissioner | Social Media Minimum Age (SMMA) Obligations [SEC=OFFICIAL]  
**Attachments:** CC25-0105\_Correspondence from eSafety Commissioner to Roblox regarding SMMA obligations.pdf

**OFFICIAL**

Dear **s 22**

Many apologies, we understand the link to [How to assess if a service is an age-restricted social media platform | eSafety Commissioner](#) was broken. We have now corrected the link within the attached letter.

Please find re-attached correspondence from the eSafety Commissioner, Julie Inman Grant, providing update on the social media minimum age (SMMA) obligations.

Many thanks

Kind regards

**s 22**

Executive Officer  
Office of the eSafety Commissioner

 [esafety.gov.au](http://esafety.gov.au)

 **s 22**



eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

4 September 2025

CC25-0105

s 22



Roblox

By email: s 22

Cc'd: s 22 ; s 22 ; s 22

Dear s 22

## Social media minimum age obligation

I am writing to provide you with an update on the social media minimum age (**SMMA**) obligations, specifically our next steps in determining whether individual services will be subject to the SMMA obligations and our development of regulatory guidance.

### Background

An age-restricted social media platform is defined in section 63C(1)(a) of the *Online Safety Act 2021* (**the Act**) as an electronic service with the sole purpose, or a significant purpose, of enabling online social interaction between 2 or more end-users, which allows end-users to link to, or interact with, some or all of the other end-users, and which allows end-users to post material on the service. Section 63C(6) provides that an electronic service is not an age-restricted social media platform if the service is specified in the legislative rules.

On 29 July 2025, the Minister for Communications, the Honourable Anika Wells MP, made the *Online Safety (Age Restricted Social Media Platforms) Rules 2025*<sup>1</sup> (**the Rules**) under the Act, specifying certain classes of services that are not age-restricted social media platforms.

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<sup>1</sup> See the Federal Register of Legislation in relation to the Rules - [Online Safety \(Age-Restricted Social Media Platforms\) Rules 2025 - Federal Register of Legislation](#), and the Explanatory Statement to the

Where a service demonstrates that it falls within a class of service specified in the Rules, it will not be subject to the SMMA obligation set out in section 63D of the Act. The Explanatory Statement to the Rules states the intention of the Rules is to focus the SMMA obligation on platforms with features and functions known to be harmful to children, whilst excluding those services that pose fewer harms to children and which help children and young people to thrive.

## Assessment of specific services

eSafety is considering whether certain services may be age-restricted social media platforms and whether some of these services may be excluded under the Rules.

Thank you for your email on 22 August 2025 outlining Roblox's position that it considers Roblox is not an age-restricted social media platform. To assist services to self-assess, eSafety has published guidance on how to assess whether a service is an age-restricted social media platform: [eSafety.gov.au/social-media-age-restrictions-assessment](https://esafety.gov.au/social-media-age-restrictions-assessment).

We are encouraging Roblox and other services to use this guidance to self-assess whether or not they meet the definition of an age-restricted social media platform as soon as possible, and to advise eSafety of their assessment in advance of the SMMA obligations taking effect on 10 December 2025.

We will be using this guidance to undertake our own preliminary assessment of Roblox and whether it is an age-restricted social media platform. We note that one of the classes of excluded services is services that have the sole or primary purpose of enabling end-users to play online games with other end-users.

If you consider that Roblox has additional information that may inform eSafety's assessment, having regard to the guidance, we encourage you to send that to us as soon as possible.

## Regulatory guidance for age-restricted social media platforms

eSafety has been engaging in broad consultation to support the development of regulatory guidance in relation to the SMMA obligation.

We understand from discussions with industry the preference for early guidance to assist platforms with their preparation for the commencement of the SMMA obligation. As we have

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Rules - [Online Safety \(Age-Restricted Social Media Platforms\) Rules 2025 - Federal Register of Legislation](#).

indicated during consultations, eSafety's regulatory guidance will have regard to knowledge and practice from our previous work on age assurance, results from the government's technical trial, feedback from the consultation and comparable international frameworks.

The guidance will include principles intended to facilitate positive outcomes for Australian end-users as well as support platforms to achieve the intention of the SMMA obligation. These will include and have regard to the principles raised consistently in consultations:

- Age assurance measures, whether deployed in a standalone manner or as part of a multi-layered approach, should be accurate, effective and robust
- Age assurance measures should be privacy-preserving and adopt a data minimisation approach
- Age assurance measures should respect and promote human rights and minimise the potential for bias and discrimination
- Services should be clear and transparent about the age assurance measures they implement by clearly informing users about their options to confirm their age, what data will be used, how data is stored and protected and what the user's rights are in the process.

We recognise platforms vary in design, risk profile, and user base. What is reasonable on one service may not be reasonable on another and may also evolve over time. As outlined by eSafety during consultations, the regulatory guidance will set out parameters in relation to reasonable steps and will not be prescriptive (for example, the guidance will not state that a certain class or type of tool must be used).

Consistent with the SMMA obligation, platforms are responsible for determining appropriate technical specifications in relation to the use of tools or technology to assess the age of Australian end-users and prevent the creation and holding of accounts by Australian children under the age of 16. Decisions around which tools or technologies to implement should be guided by the principles in the regulatory guidance, which we have foreshadowed at a general level above, as well as informative sources like the government's age assurance technology trial report,<sup>2</sup> a platform's own testing/innovation and emerging international standards.

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<sup>2</sup> [Home - Age Assurance Technology Trial](#)

## eSafety's expectations for age-restricted social media platforms

eSafety will provide further guidance to industry in the coming weeks, however we wish to make clear our expectations for what services should be doing **now** in preparation for the SMMA obligation taking effect on 10 December. These expectations are intended to apply to services who are age-restricted social media platforms, and we appreciate that you may currently be assessing whether Roblox is captured or not. eSafety will form a preliminary view in the coming weeks as to whether Roblox is captured, and in the interim, we are sharing these expectations to assist services with any preparation that it may need to undertake should it assess or be assessed as an age-restricted social media platform.

Importantly, and consistent with prior messaging,<sup>3</sup> eSafety expects services to prioritise:

- Preparing to find and deactivate accounts held by Australian end-users under 16 from 10 December. This includes end-users with a self-declared age of under 16 as well as any end-users determined to be under 16 through a service's systems and processes.
- Providing early, clear and age-appropriate communications to affected end-users including:
  - how they can download or otherwise preserve/access their account information while they are unable to use an account to access an age-restricted social media platform
  - what will happen to their account information when their account is deactivated
  - how and when they can expect or request their account be reinstated, including how to appeal if they believe their account was deactivated in error, and
  - support information and resources, noting that some end-users may feel distressed or confused.
- Taking reasonable steps to prevent current Australian end-users under 16 with accounts from increasing their declared age to over 16, opening new accounts indicating that they are over 16, or seeking to change their location or other settings in an effort to open or retain an active account on an age-restricted social media platform.

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<sup>3</sup> See the eSafety Commissioner's speech at the National Press Club in Canberra on 24 June 2025: [Swimming between the digital flags: helping young Australians navigate social media's dangerous currents | eSafety Commissioner](#).

- Examples of steps taken by some social media services are set out in eSafety's transparency report titled '[Behind the Screen](#)', published in February 2025.
- Ensuring that the mechanisms for reporting a potential underage end-user and assessing those reports are accessible, fair, transparent, timely and empower end-users/reporters with the option to appeal or challenge an outcome, and that services are prepared to manage potential increase in volume of reports from 10 December.
- Scoping effective age assurance measures to be applied at the point of account creation and across the user-journey. Self-declaration, on its own, will not be sufficient. Services should give consideration to:
  - the overview of the principles eSafety has outlined above
  - building on the systems and processes already in place to enforce current minimum age rules
  - how fallback mechanisms might be triggered for borderline cases
  - circumvention risks, including location-based circumvention such as VPN use or age-based circumvention such as spoofing techniques, and appropriate safeguards to combat these risks.

Services are encouraged to document decision-making, risk and impact assessments and other key information related to the implementation of age assurance measures that may demonstrate the taking of reasonable steps.

eSafety has also published some [FAQs](#) on the eSafety website which may assist in developing plans and communications to support and inform end-users' understanding of the SMMA obligations.<sup>4</sup>

The above points are intended to provide you with an early, interim indication of our approach and position. More detailed guidance will be provided shortly.

In the meantime, please reach out if you have any questions about the steps outlined above.

As you are aware, the privacy regulator, the Office of the Australian Information Commissioner (**OAIC**), is a co-regulator of the SMMA legislative requirements and we will continue to work closely with the OAIC as we progress with preparation for implementation of the SMMA obligation.

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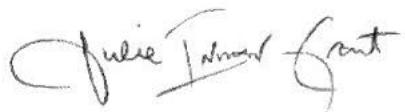
<sup>4</sup> eSafety website, [Social media 'ban' or delay FAQ | eSafety Commissioner](#).

## Next steps

We would appreciate your response to this letter, and in particular, any information you consider relevant to an assessment of whether Roblox is an age-restricted social media platform or whether it is excluded under the Rules, by 18 September 2025.

Please do not hesitate to contact my team at **s 47E(d)** [@esafety.gov.au](mailto:@esafety.gov.au) to discuss.

Yours faithfully



Julie Inman Grant  
eSafety Commissioner

---

**From:** s 22  
**Sent:** Thursday, 11 September 2025 1:06 PM  
**To:** s 22  
**Cc:** Julie Inman Grant s 22  
**Subject:** Re: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]  
**Attachments:** xx0925 DRAFT MEDIA RELEASE - Roblox (091126 Roblox changes v2).pdf; xx0925 DRAFT MEDIA RELEASE - Roblox (091126 Roblox changes v2).docx

Hi s 22,

Apologies, please find attached in both Word and PDF with our changes - grateful if you can confirm.  
Thank you.

Best,  
s 22

On Thu, Sep 11, 2025 at 12:15 PM s 22 [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Thanks s 22. We can't see any changes in the version you attached, could you confirm it was the correct version?

s 22

---

**From:** s 22  
**Sent:** Thursday, 11 September 2025 12:11 PM  
**To:** s 22 [@esafety.gov.au>; Julie Inman Grant s 22 \[@esafety.gov.au  
\\*\\*Cc:\\*\\* s 22 \\[@esafety.gov.au>; s 22 \\\[@esafety.gov.au>; s 22 \\\\[@esafety.gov.au>; s 22 \\\\\[@esafety.gov.au>; s 22 \\\\\\[@esafety.gov.au  
\\\\\\\*\\\\\\\*Subject:\\\\\\\*\\\\\\\* Re: eSafety Commissioner Thanks and Follow-up: Roblox \\\\\\\[SEC=OFFICIAL\\\\\\\]\\\\\\]\\\\\\(mailto:@esafety.gov.au\\\\\\)\\\\\]\\\\\(mailto:@esafety.gov.au\\\\\)\\\\]\\\\(mailto:@esafety.gov.au\\\\)\\\]\\\(mailto:@esafety.gov.au\\\)\\]\\(mailto:@esafety.gov.au\\)\]\(mailto:@esafety.gov.au\)](mailto:@esafety.gov.au)

Hi s 22,

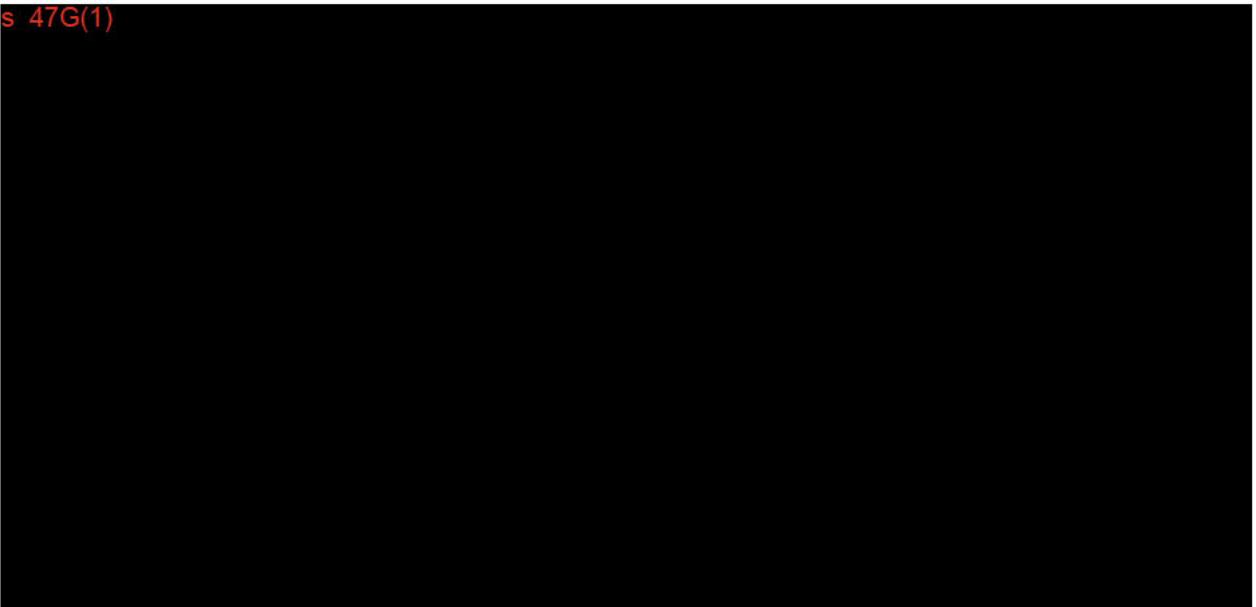
We have made some changes to the draft statement for factual accuracy - please see attached.



eSafety Commissioner

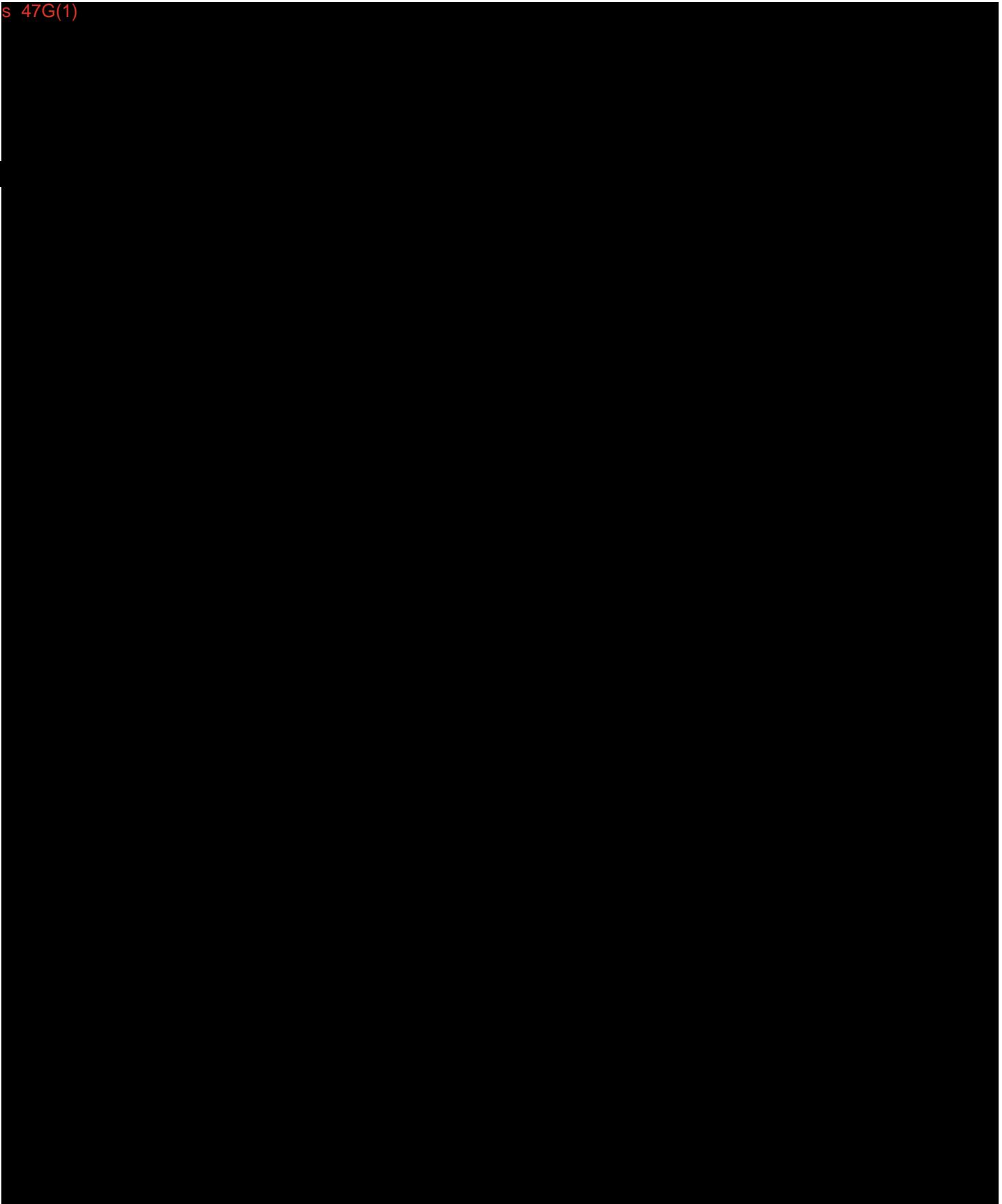
s 47G(1)

s 47G(1)

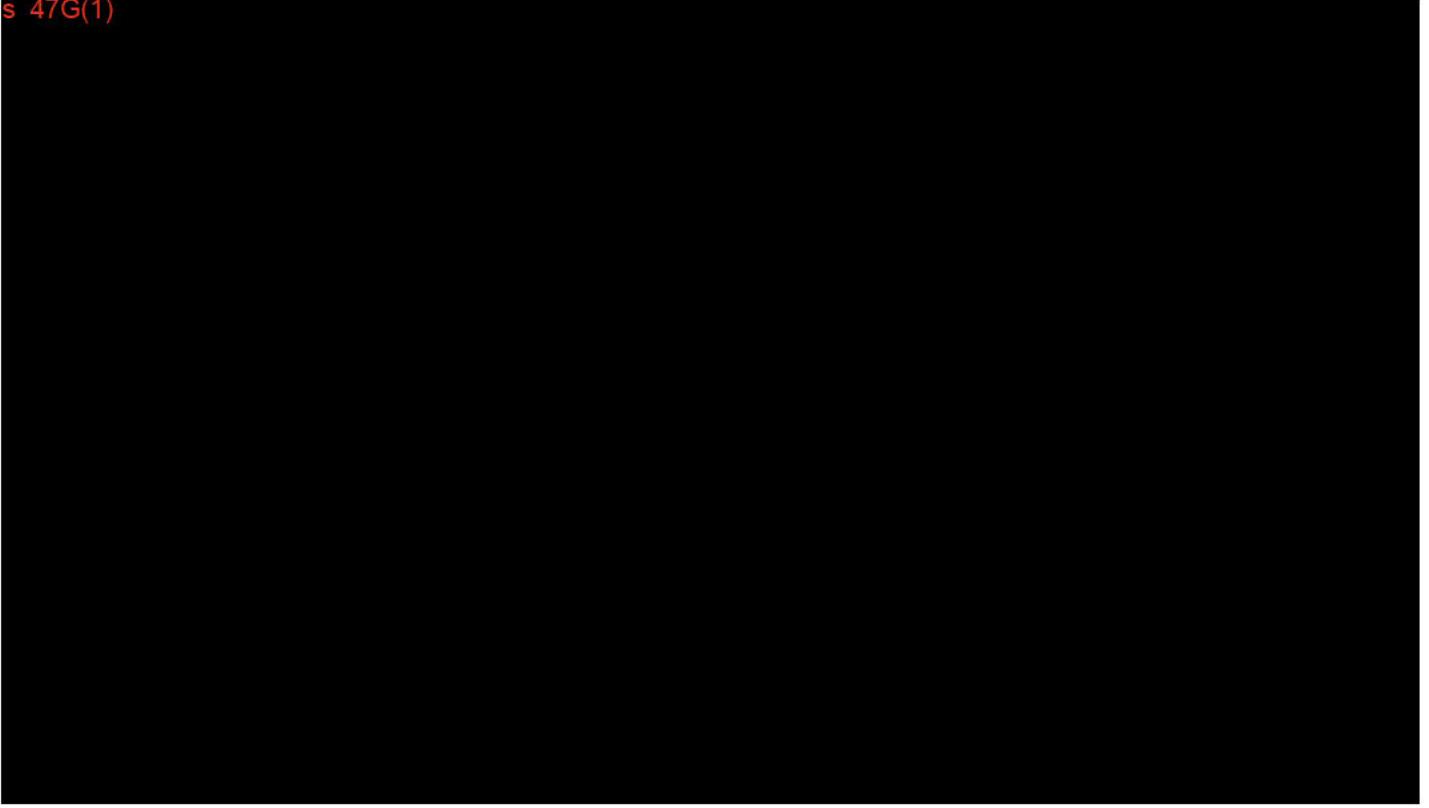


s 47G(1)

s 47G(1)



s 47G(1)



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**From:** [REDACTED] **s 22**  
**Sent:** Monday, 15 September 2025 2:56 PM  
**To:** Julie Inman Grant  
**Cc:** eSafety Commissioner; [REDACTED] **s 22** eSafety Industry Supervision; Social Media Minimum Age Restrictions; [REDACTED] **s 22**; [REDACTED] **s 22**  
**Subject:** Re: Amended: CC25-0105\_Correspondence from eSafety Commissioner | Social Media Minimum Age (SMMA) Obligations [SEC=OFFICIAL]  
**Attachments:** Roblox Letter to eSafety ARSMP 091525 (signed).pdf

You don't often get email from [REDACTED] **s 22**. [Learn why this is important](#)

Dear Julie,

Thank you for your correspondence of 4 September 2025 (below).

Please find our response attached.

Best,

**s 22**

 970 Park Place, San Mateo, CA 94403

On Thu, Sep 4, 2025 at 1:45 PM eSafety Commissioner [REDACTED] **s 47E(d)** [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Dear [REDACTED] **s 22**

Many apologies, we understand the link to [How to assess if a service is an age-restricted social media platform | eSafety Commissioner](#) was broken. We have now corrected the link within the attached letter.

Please find re-attached correspondence from the eSafety Commissioner, Julie Inman Grant, providing update on the social media minimum age (SMMA) obligations.

Many thanks



corp.roblox.com

3150 S Delaware St  
San Mateo, CA  
94403

15 September 2025

Julie Inman Grant  
eSafety Commissioner  
By email: [s 22 @esafety.gov.au](mailto:s 22 @esafety.gov.au)

Copy to: [s 47E\(d\) @esafety.gov.au](mailto:s 47E(d) @esafety.gov.au)  
[s 47E\(d\) @esafety.gov.au](mailto:s 47E(d) @esafety.gov.au)  
[s 47E\(d\) @esafety.gov.au](mailto:s 47E(d) @esafety.gov.au)

Dear Julie,

Thank you for your letter of 4 September 2025.

As requested, we are writing to provide eSafety with information we consider relevant to the assessment of whether Roblox is an age-restricted social media platform (**ARSMP**), including whether Roblox is excluded under the Online Safety (Age Restricted Social Media Platforms) Rules 2025 (**Rules**).

Thank you for sharing your guidance on how to assess whether a service is an ARSMP. We have considered this guidance in finalising our assessment of whether Roblox meets the definition of an ARSMP.

In our view, Roblox does not meet the definition of an ARSMP in section 63C(1)(a) of the *Online Safety Act 2021 (OSA)* [s 47G\(1\)](#)

[s 47G\(1\)](#)

In any event, in our view it is clear that Roblox is excluded under section 63C(6)(b) of the OSA, which provides that an electronic service is not an ARSMP if it is a service specified in the Rules. Section 5(1)(b) of the Rules specifies "services that have the sole or primary purpose of enabling end-users to play online games with other end-users".

The primary purpose of Roblox is to enable end-users to play online games with other end-users. Online gameplay between end-users is fundamental to Roblox - it is the predominant and most important purpose of our platform. End-users access Roblox to





corp.roblox.com

3150 S Delaware St  
San Mateo, CA  
94403

play online games with other end-users. If we were to take away the ability for end-users to play online games with other end-users, Roblox wouldn't be Roblox.

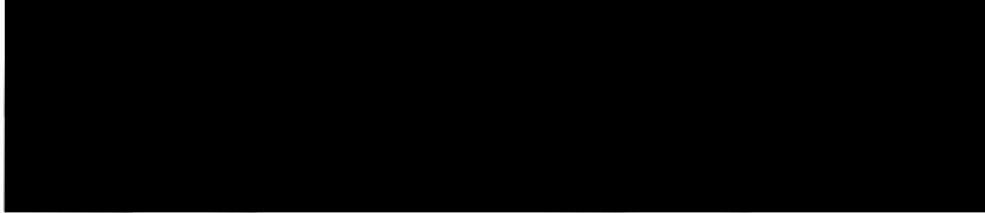
**s 47G(1)**

A large black rectangular redaction box covering several lines of text.

In the Discussion Paper that accompanied the exposure draft of the Rules, the Government expressly acknowledged that Roblox would be excluded from being an ARSMP, stating that section 5(1)(b) of the Rules "would exclude games such as **Roblox**, Fortnite and Minecraft". We agree with this position and think it is clear that Roblox falls within the scope of the section 5(1)(b) exemption.

Yours sincerely,

**s 22**

A large black rectangular redaction box covering a signature.

---

**From:** Julie Inman Grant  
**Sent:** Monday, 15 September 2025 3:03 PM  
**To:** s 22  
**Cc:** eSafety Commissioner; s 22; eSafety Industry Supervision; Social Media Minimum Age Restrictions; s 22 s 22  
**Subject:** RE: Amended: CC25-0105\_Correspondence from eSafety Commissioner | Social Media Minimum Age (SMMA) Obligations [SEC=OFFICIAL]

**OFFICIAL**

Thank you, s 22. And, thank you for taking the time to undertake the self-assessment. Please consider this a formal acknowledgement of receipt. Julie

---

**From:** s 22  
**Sent:** Monday, 15 September 2025 2:56 PM  
**To:** Julie Inman Grant s 22 @eSafety.gov.au>  
**Cc:** eSafety Commissioner s 47E(d) @eSafety.gov.au>; s 22  
eSafety Industry Supervision s 47E(d) @eSafety.gov.au>; Social Media Minimum Age Restrictions  
s 47E(d) @esafety.gov.au> s 22  
**Subject:** Re: Amended: CC25-0105\_Correspondence from eSafety Commissioner | Social Media Minimum Age (SMMA) Obligations [SEC=OFFICIAL]

Dear Julie,

Thank you for your correspondence of 4 September 2025 (below).

Please find our response attached.

Best,

s 22

970 Park Place, San Mateo, CA 94403

On Thu, Sep 4, 2025 at 1:45 PM eSafety Commissioner s 47E(d) [@esafety.gov.au](mailto:@esafety.gov.au)> wrote:

**OFFICIAL**

Dear s 22

Many apologies, we understand the link to [How to assess if a service is an age-restricted social media platform | eSafety Commissioner](#) was broken. We have now corrected the link within the attached letter.

Please find re-attached correspondence from the eSafety Commissioner, Julie Inman Grant, providing update on the social media minimum age (SMMA) obligations.

Many thanks

Kind regards

s 22

Executive Officer

Office of the eSafety Commissioner

 [esafety.gov.au](http://esafety.gov.au)

 s 22



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—*land, waters and community. We pay our respects to First Nations people, and to Elders past and present.*

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s 22



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**From:** s 22 [REDACTED]  
**Sent:** Friday, 19 September 2025 6:57 AM  
**To:** Julie Inman Grant  
**Subject:** Re: Will you be at UNGA? [SEC=OFFICIAL]

Thanks for letting me know, Julie. Looking forward to reconnecting soon. In the meantime, safe travels, and let me know if you need anything.

s 22 [REDACTED]

3150 S Delaware St, San Mateo, CA 94403

On Thu, Sep 18, 2025 at 2:24 AM Julie Inman Grant <s 22 [REDACTED] [@esafety.gov.au](mailto:@esafety.gov.au)> wrote:

**OFFICIAL**

Hi s 22 [REDACTED]

Unfortunately, the focus of our trip is going to be on meeting with the social media minimum age companies and AI companies covered by our codes + work we're doing with the Stanford Social Media Lab. We are back-to-back the entire week.

I did see something about the regulator's roundtable at FOSI on LinkedIn but I don't think I have seen an invite. It's worth noting the following week all of the senior regulators are meeting in Dublin so I will likely be in Europe in the lead up but thanks for thinking of me. s 47G(1) [REDACTED]

All the best,

Julie

---

**From:** s 22 [REDACTED]  
**Sent:** Thursday, 18 September 2025 2:14 PM

**To:** Julie Inman Grant **s 22** [@eSafety.gov.au](#)>  
**Subject:** Re: Will you be at UNGA? [SEC=OFFICIAL]

So sorry that I'll miss you. If you have any availability to get dinner with **s 22**, I'm sure they would love it.

I'm hoping to catch up with you in person at the FOSI conference in November. FOSI and Roblox are hosting a regulator dinner on Sunday night, November 9th. I hope you can join us. Official invites should be going out soon.. Then, maybe we can scatter off to find some time just the two of us to catch up.

**s 22**

3150 S Delaware St, San Mateo, CA 94403

On Tue, Sep 16, 2025 at 4:34 PM Julie Inman Grant **s 22** [@esafety.gov.au](#)> wrote:

**OFFICIAL**

**s 22** – Yes, indeed there is plenty to talk about and I think it would be helpful for me to provide you some insight on how the “engagement went.” While you’re at UNGA, I’ll be on the West Coast, in San Fran, the Valley and at Stanford. I’m there from Tuesday, the 23, leaving the following Saturday if you happen to find yourself there any of those days. Thanks for reaching out. Julie

---

**From:** **s 22**  
**Sent:** Wednesday, 17 September 2025 5:48 AM  
**To:** Julie Inman Grant **s 22** [@eSafety.gov.au](#)>  
**Subject:** Will you be at UNGA?

Hi Julie,

I thought I would take a chance to reach out and see if you were attending UNGA? I'll be there all week next week and was hoping to see you if you were in NY.

There's certainly plenty to catch up on! I hope you're well!

Kind regards,

**s 22**

[REDACTED]

**3150 S Delaware St, San Mateo, CA 94403**

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**From:** [REDACTED] **s 22**  
**Sent:** Friday, 19 September 2025 1:25 PM  
**To:** Julie Inman Grant; [REDACTED] **s 22**  
**Cc:** [REDACTED] **s 22**  
**Subject:** Re: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]  
**Attachments:** Roblox - [REDACTED] **s 47G(1)** (2).pdf

Hi Julie, hi [REDACTED] **s 22**

[REDACTED] **s 47G(1)**

On a related matter, we also wanted to provide eSafety with some additional information to address misreporting in the Australian media over the last few days, including a Sydney Morning Herald article published yesterday. For completeness:

- Our recently announced new feature [Roblox Moments](#) (short-form video) is **not available in Australia**.
- Contrary to reporting, Roblox does not offer social media feeds within experiences. We continue to prohibit users from sharing external links, uploading real-world photos or videos, re-sharing content, or sharing news on Roblox.
- Some Roblox developers offer functionality that allows users to capture images or videos of their Roblox gameplay and share it on Roblox. We have launched developer tools in respect of these features and are implementing a new policy from 30 September to disallow this type of sharing in Australia, noting we do not allow any user-sharing of videos or images.
- Inappropriate content (such as sexualised avatars) is a violation of our Community Standards. We have a range of robust measures to detect and remove such content from our platform.

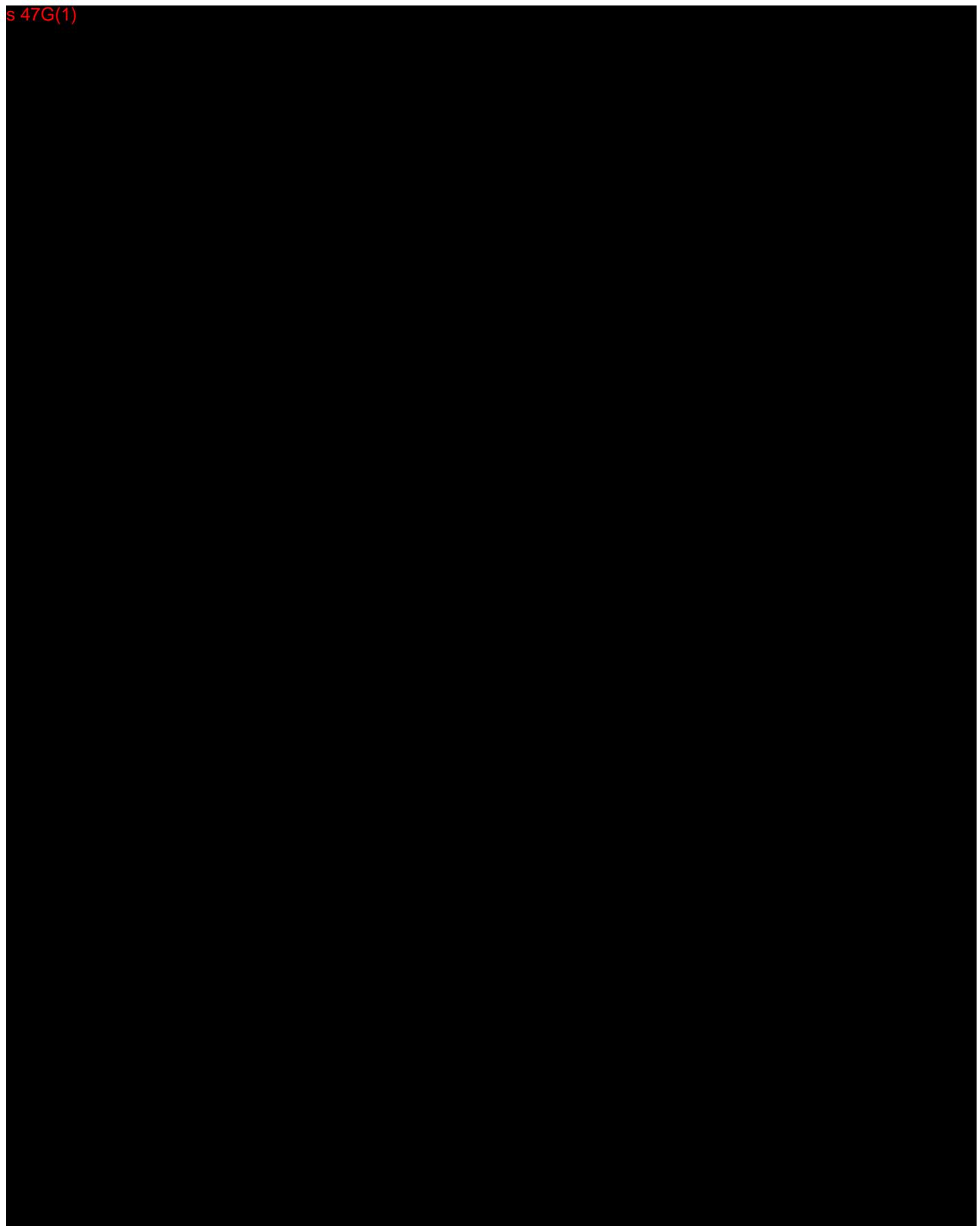
Please let us know if you have any questions. Thank you.

[REDACTED] **s 22**

**D****D****R****I**  
970 Park Place, San Mateo, CA 94403

On Sat, Sep 13, 2025 at 10:31 AM [REDACTED] **s 22** <[@esafety.gov.au](mailto:@esafety.gov.au)> wrote:

s 47G(1)



s 47G(1)

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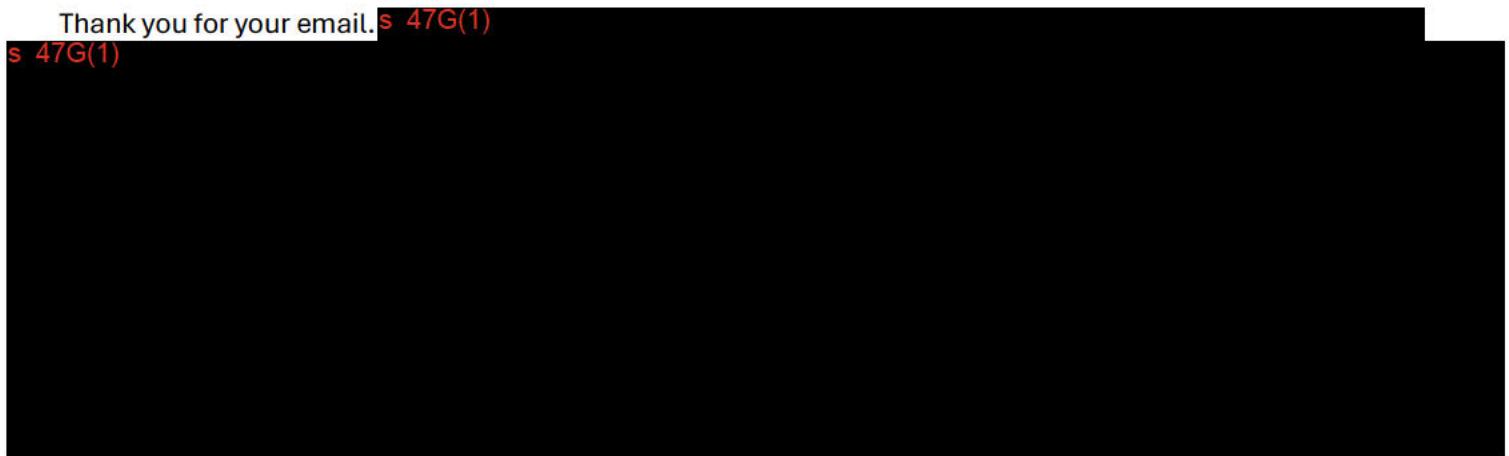
**From:** **s 22**  
**Sent:** Friday, 19 September 2025 2:04 PM  
**To:** **s 22**; Julie Inman Grant  
**Cc:** **s 22**  
**Subject:** RE: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]

**OFFICIAL**

Dear **s 22**

Thank you for your email. **s 47G(1)**

**s 47G(1)**



Kind regards,

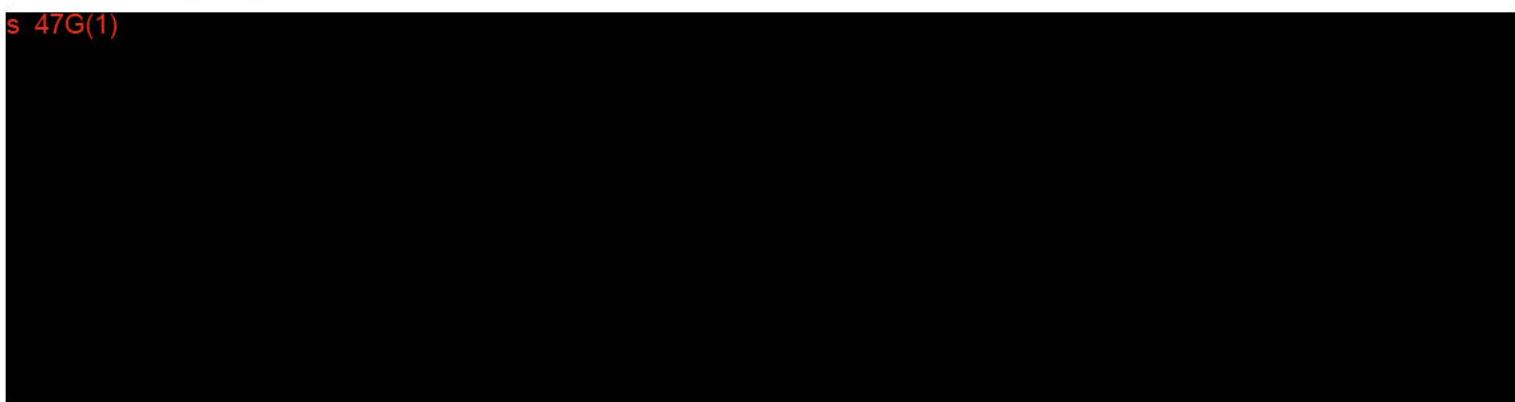
**s 22**

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**From:** **s 22**  
**Sent:** Friday, 19 September 2025 1:25 PM  
**To:** Julie Inman Grant **s 22** **@eSafety.gov.au**; **s 22** **@eSafety.gov.au**  
**Cc:** **s 22** **@esafety.gov.au**; **s 22** **@eSafety.gov.au**  
**Subject:** Re: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]

Hi Julie, hi **s 22**

**s 47G(1)**



On a related matter, we also wanted to provide eSafety with some additional information to address misreporting in the Australian media over the last few days, including a Sydney Morning Herald article published yesterday. For completeness:

- Our recently announced new feature [Roblox Moments](#) (short-form video) is **not available in Australia**.
- Contrary to reporting, Roblox does not offer social media feeds within experiences. We continue to prohibit users from sharing external links, uploading real-world photos or videos, re-sharing content, or sharing news on Roblox.
- Some Roblox developers offer functionality that allows users to capture images or videos of their Roblox gameplay and share it on Roblox. We have launched developer tools in respect of these features and are implementing a new policy from 30 September to disallow this type of sharing in Australia, noting we do not allow any user-sharing of videos or images.
- Inappropriate content (such as sexualised avatars) is a violation of our Community Standards. We have a range of robust measures to detect and remove such content from our platform.

Please let us know if you have any questions. Thank you.

s 22



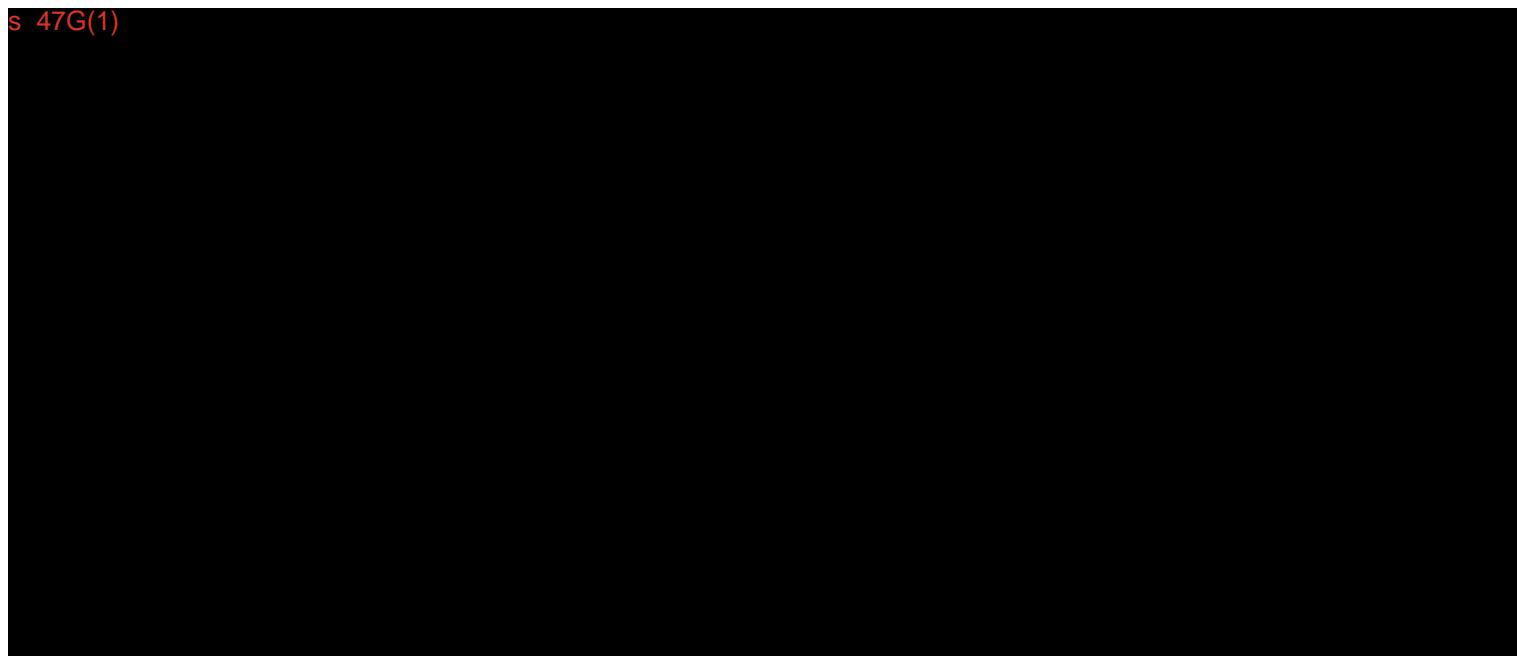
 970 Park Place, San Mateo, CA 94403

On Sat, Sep 13, 2025 at 10:31 AM s 22

[@esafety.gov.au](#) > wrote:

**OFFICIAL**

Hi s 22



Hope that provides clarification.

Kind regards,

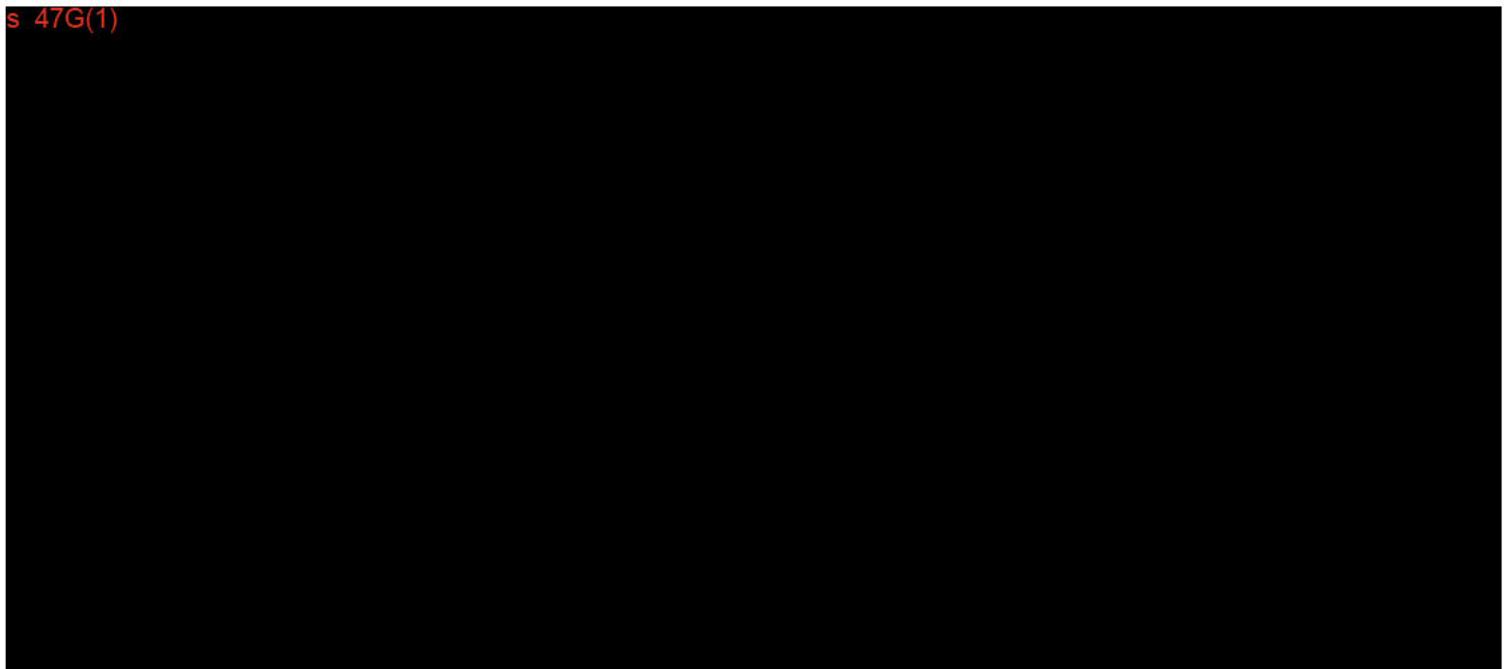
s 22

---

**From:** s 22 [REDACTED]  
**Sent:** Saturday, 13 September 2025 8:56 AM  
**To:** s 22 [REDACTED] @eSafety.gov.au>; Julie Inman Grant s 22 [REDACTED] @eSafety.gov.au>  
**Cc:** s 22 [REDACTED] @esafety.gov.au>; s 22 [REDACTED] @eSafety.gov.au>; s 22 [REDACTED] @eSafety.gov.au>; s 22 [REDACTED] @eSafety.gov.au>; s 22 [REDACTED] @eSafety.gov.au>  
**Subject:** Re: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]

Hi s 22 ,

s 47G(1)



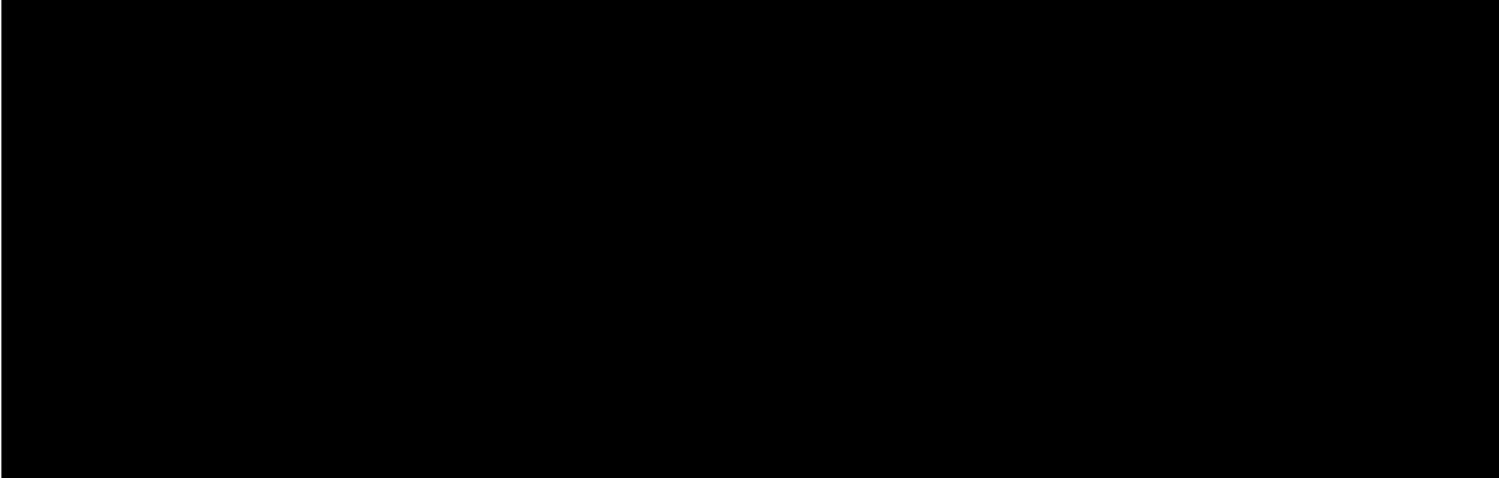
s 47G(1)

[REDACTED] Thank you.

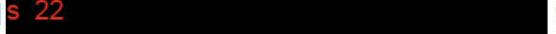
s 22

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s 47G(1)



\*\*

On Fri, Sep 12, 2025 at 5:15 PM s 22  wrote:

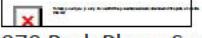
Hi s 22 

Confirming receipt - thanks for letting us know.

Best,

Chris

s 22 

 970 Park Place, San Mateo, CA 94403

On Fri, 12 Sep 2025 at 4:28 pm, s 22  [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Hi s 22 

s 47G(1) 

s 47G(1)

Kind regards,

s 22

s 47G(1)

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**From:** s 22  
**Sent:** Thursday, 11 September 2025 5:45 PM  
**To:** s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au)  
**Cc:** Julie Inman Grant s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au) s 22  
[REDACTED] [@esafety.gov.au](mailto:@esafety.gov.au); s 22  
[REDACTED] [@eSafety.gov.au](mailto:@eSafety.gov.au); s 22  
[REDACTED] [@eSafety.gov.au](mailto:@eSafety.gov.au); s 22  
[REDACTED] [@eSafety.gov.au](mailto:@eSafety.gov.au); s 22  
[REDACTED]  
**Subject:** Re: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]

Hi s 22 ,

s 47G(1)

Best,

s 22

[redacted]

[redacted]

 970 Park Place, San Mateo, CA 94403

On Thu, Sep 11, 2025 at 4:45 PM s 22 <[@esafety.gov.au](mailto:@esafety.gov.au)> wrote:

**OFFICIAL**

Hi s 22, all,

s 47G(1)

Kind regards,

s 22

---

From: s 22

Sent: Thursday, 11 September 2025 1:15 PM

To: s 22

Cc: Julie Inman Grant s 22 <[@eSafety.gov.au](mailto:@eSafety.gov.au)> s 22

<[@esafety.gov.au](mailto:@esafety.gov.au)> s 22

<[@eSafety.gov.au](mailto:@eSafety.gov.au)> s 22

<[@eSafety.gov.au](mailto:@eSafety.gov.au)> s 22

<[@eSafety.gov.au](mailto:@eSafety.gov.au)> s 22

<[@eSafety.gov.au](mailto:@eSafety.gov.au)> s 22

Subject: RE: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]

**OFFICIAL**

Thanks s 22 . s 47G(1)

s 47G(1)

s 22

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From: s 22

Sent: Thursday, 11 September 2025 1:06 PM

To: s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au)

Cc: Julie Inman Grant s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au); s 22

s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au); s 22 [@esafety.gov.au](mailto:@esafety.gov.au); s 22  
s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au); s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au); s 22

Subject: Re: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]

Hi s 22 ,

s 47G(1)

Best,

s 22

On Thu, Sep 11, 2025 at 12:15 PM s 22 [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

s 22 . s 47G(1)

s 22

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From: s 22

Sent: Thursday, 11 September 2025 12:11 PM

To: s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au); Julie Inman Grant

s 22 [@eSafety.gov.au](mailto:@eSafety.gov.au)

Cc: s 22

[@esafety.gov.au](mailto:@esafety.gov.au); s 22

**Subject:** Re: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]

Hi s 22 ,

s 47G(1)

We also promised to come back to you on the additional queries from last week's meeting - our responses are below.

Best,

s 22

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1. Confirmation that age assurance will be available for all Australian users from 1 January 2026.

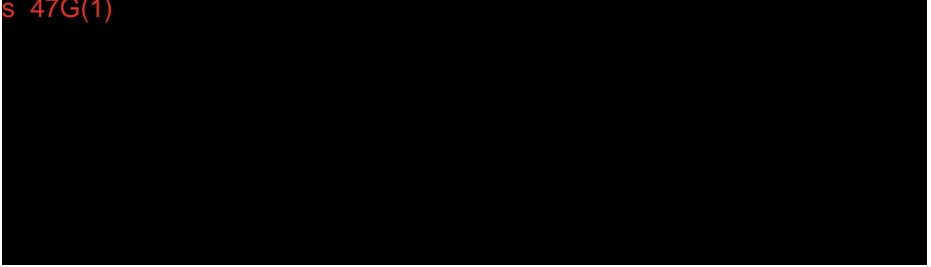
*Roblox: From 1 January 2026, all users in Australia will need to age assure in order to communicate on our platform.*

2. What about an overseas adult trying to communicate with an Australian child?

*Roblox: The location of the adult does not matter. It will be applicable to all 18+ users globally, not just those in Australia. From 1/1/26:*

- without successful age estimation using FAE, communications features will remain default off
- after successful age estimation, communications features will be enabled
- once communications features are enabled, 18+ users will not be able to communicate with U16 users without parental consent
- Parental controls in place to disable communications features for U16 users

s 47G(1)



4. Will the changes apply to only new users who sign up after January 1, 2026 or will it apply to all users?

**Roblox:** All users.

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s 22



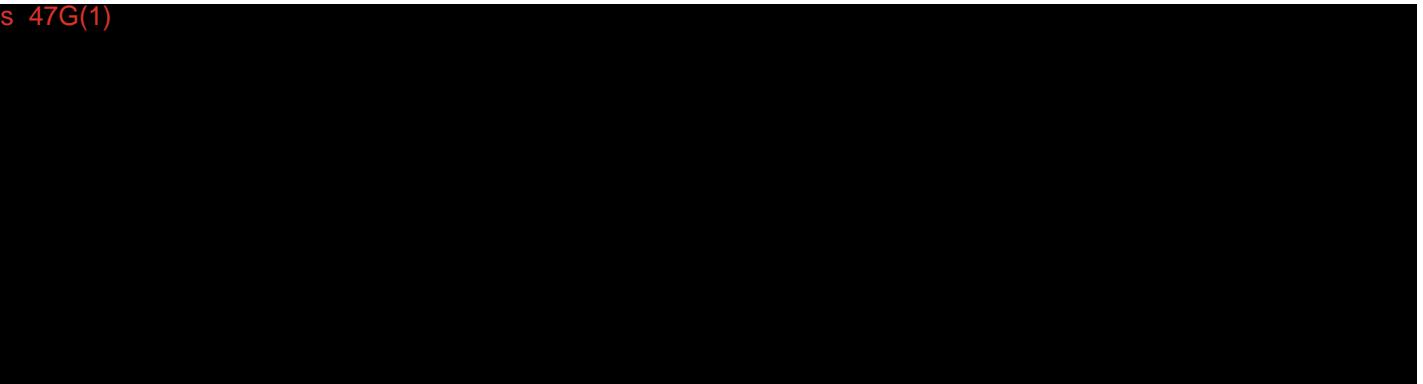
 970 Park Place, San Mateo, CA 94403

On Thu, Sep 11, 2025 at 9:26 AM s 22  @esafety.gov.au> wrote:

**OFFICIAL**

Hi s 22 ,

s 47G(1)



Kind regards,

s 22

**From:** s 22 [REDACTED]  
**Sent:** Thursday, 11 September 2025 8:53 AM  
**To:** Julie Inman Grant s 22 [REDACTED] @eSafety.gov.au>; s 22 [REDACTED]  
[REDACTED] @eSafety.gov.au>  
**Cc:** s 22 [REDACTED]  
[REDACTED] @eSafety.gov.au> s 22 [REDACTED] @eSafety.gov.au>; s 22 [REDACTED]  
[REDACTED] @eSafety.gov.au>; s 22 [REDACTED] @eSafety.gov.au>; s 22 [REDACTED]  
[REDACTED] @eSafety.gov.au>; s 22 [REDACTED]  
**Subject:** Re: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]

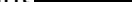
Hi Julie, hi ~~s~~ 22

S 47G(1)

Best,

s 22

970 Park Place, San Mateo, CA 94403

On Wed, Sep 10, 2025 at 9:47 PM Julie Inman Grant  [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

Thanks, **s 22** all. Julie

## Get Outlook for iOS

**From:** s 22  
**Sent:** Wednesday, September 10, 2025 9:39:03 PM  
**To:** s 22 [@eSafety.gov.au>  
\*\*Cc:\*\* s 22](mailto:@eSafety.gov.au)

s 22 @eSafety.gov.au>

Subject: Re: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]

Hi s 22

Just a quick note to acknowledge receipt and confirm that we'll come back to you by midday tomorrow.

We appreciate the advance notice - thank you.

s 22

[REDACTED]



[970 Park Place, San Mateo, CA 94403](http://970 Park Place, San Mateo, CA 94403)

On Wed, 10 Sep 2025 at 6:56 pm, s 22 @esafety.gov.au> wrote:

**OFFICIAL**

Dear s 22

s 47G(1)

[REDACTED]

s 47G(1)

[REDACTED]

s 47G(1)

Kind regards,

s 22

From: s 22  
Sent: Thursday, 4 September 2025 7:45 AM  
To: Julie Inman Grants s 22 [@eSafety.gov.au>  
Cc: s 22 \[@eSafety.gov.au> s 22  
\\[REDACTED\\] \\[@esafety.gov.au  
\\\[REDACTED\\\] \\\[@eSafety.gov.au> s 22  
\\\\[REDACTED\\\\] \\\\[@eSafety.gov.au> s 22  
\\\\\[REDACTED\\\\\] \\\\\[@eSafety.gov.au> s 22  
\\\\\\[REDACTED\\\\\\] \\\\\\[@esafety.gov.au> s 22  
\\\\\\\[REDACTED\\\\\\\] \\\\\\\[@esafety.gov.au> s 22  
Subject: Re: eSafety Commissioner Thanks and Follow-up: Roblox \\\\\\\\[SEC=OFFICIAL\\\\\\\\]\\\\\\\]\\\\\\\(mailto:@esafety.gov.au\\\\\\\)\\\\\\]\\\\\\(mailto:@esafety.gov.au\\\\\\)\\\\\]\\\\\(mailto:@eSafety.gov.au\\\\\)\\\\]\\\\(mailto:@eSafety.gov.au\\\\)\\\]\\\(mailto:@eSafety.gov.au\\\)\\]\\(mailto:@esafety.gov.au\\)\]\(mailto:@eSafety.gov.au\)](mailto:@eSafety.gov.au)

Hi Julie,

Thanks for meeting with us yesterday.

We wanted to follow up and let you know that earlier today, we released an announcement about expanding age estimation to all Roblox users who access our communications features by the end of 2025. **s 22** statement with more details can be seen [here](#). We will circle back next week on your other queries.

Best,

s 22

[REDACTED]

[REDACTED]

[REDACTED]

[970 Park Place, San Mateo, CA 94403](#)

On Fri, Aug 29, 2025 at 7:01 PM Julie Inman Grant s 22 [REDACTED] [@esafety.gov.au](#) wrote:

s 22 and Team Roblox -

s 47G(1)

Many thanks,

Julie

Get [Outlook for iOS](#)

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**From:** s 22 [REDACTED]

**Sent:** Friday, August 29, 2025 5:26:28 PM

**To:** Julie Inman Grant s 22 [@eSafety.gov.au](#); s 22 [REDACTED] [@eSafety.gov.au](#)>

s 22

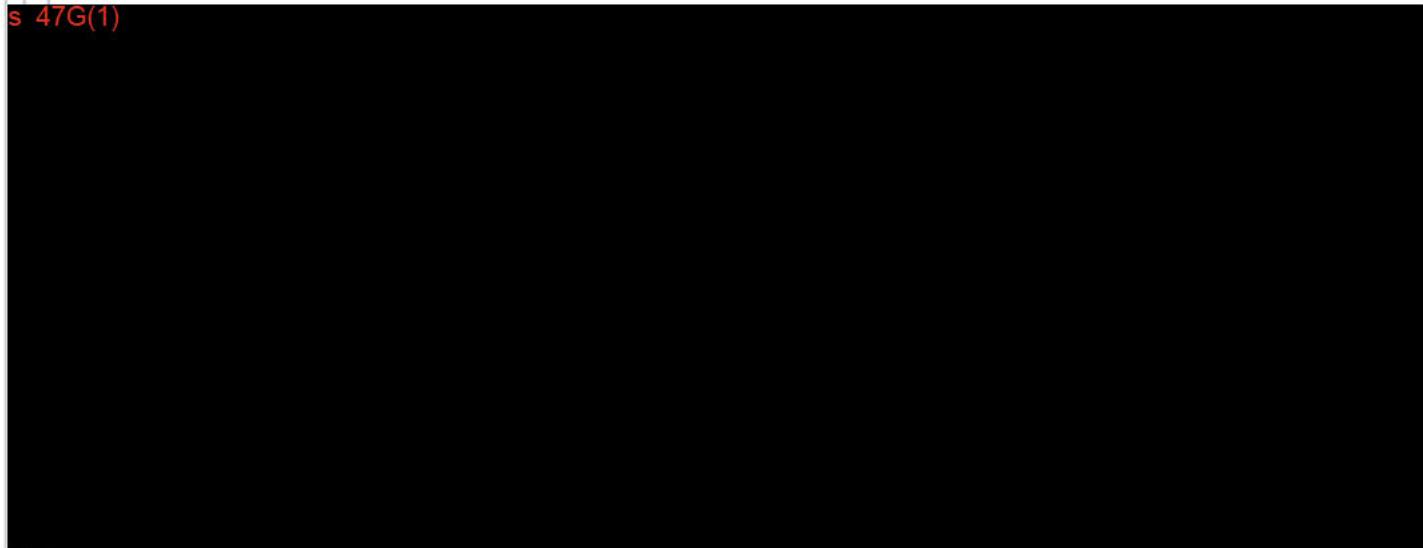
[REDACTED] [@esafety.gov.au](#); s 22

**s 22** [@eSafety.gov.au](#); **s 22** [@esafety.gov.au](#)  
**Subject:** Re: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]

Hi Julie, hi **s 22**

Thanks again for meeting with us last week and the opportunity to engage with eSafety as we work towards implementing age estimation technology on Roblox.

**s 47G(1)**



We are happy to discuss in more detail and look forward to seeing you in Sydney next week.

Best,

**s 22**



[970 Park Place, San Mateo, CA 94403](#)

On Fri, Aug 22, 2025 at 12:26 PM Julie Inman Grant **s 22** [@esafety.gov.au](#)> wrote:

**OFFICIAL**

Thank you, **s 22** . **s 47G(1)**

Safety leadership sometimes means just that – leading the way in terms of what is in the realm of both the necessary, and the possible! All the best, Julie

---

**From:** **s 22**

**Sent:** Friday, 22 August 2025 11:40 AM

**To:** Julie Inman Grant **s 22** [@eSafety.gov.au](mailto:@eSafety.gov.au)

**Cc:** **s 22**

[@esafety.gov.au](mailto:@esafety.gov.au); **s 22**  
[@eSafety.gov.au](mailto:@eSafety.gov.au); **s 22**  
[@eSafety.gov.au](mailto:@eSafety.gov.au); **s 22**  
[@esafety.gov.au](mailto:@esafety.gov.au); **s 22**  
[@esafety.gov.au](mailto:@esafety.gov.au)

**Subject:** Re: eSafety Commissioner Thanks and Follow-up: Roblox [SEC=OFFICIAL]

Dear Julie,

Thank you for making the time to meet with us this week with your team. We are grateful for the opportunity to share more details about our approach in Australia and to constructively engage with eSafety, including on our future plans.

**s 47G(1)**

We appreciate your comments about leading the way in online safety. Safety is foundational to everything we do at Roblox and we're committed to continuously evolving our platform with industry-leading safety and civility features as our community grows.

We're closely monitoring Phase 2 and eagerly anticipating the full report on the age assurance trial. We are happy to liaise with **s 22** at the appropriate time.

Thanks also for letting us know that you will be writing to a range of services about self-assessments in respect of meeting the definition of an age-restricted social media platform. We will respond to your letter once we receive it but in the meantime - if it's helpful - we are confident that Roblox is not subject to the SMMA obligation.

We'll reach out to **s 22** to coordinate availability around the Stanford conference in September. **s 22** have kindly offered to host you and anyone from eSafety at Roblox HQ in San Mateo. In the meantime, we're looking forward to seeing you again in Sydney in a few weeks.

Best wishes,

**s 22**

[REDACTED]

[REDACTED]

[REDACTED]

970 Park Place, San Mateo, CA 94403

On Thu, Aug 21, 2025 at 12:37 PM Julie Inman Grant **s 22** [@esafety.gov.au](mailto:@esafety.gov.au) wrote:

**OFFICIAL**

Dear **s 22**

Thank you all for your time yesterday and your walkthrough of the future of communications on Roblox. We appreciate the constructive approach Roblox is taking to engaging with eSafety and complying with Australian regulatory requirements and for you making the considerable effort to meet face to face.

**s 47G(1)**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

As I mentioned in our meeting, it is critical for services like yourselves to signal to others what is in the realm of the possible. It would be great to see Roblox exhibiting this kind of online safety leadership in the interests of the children and young people on your platform. We will, of course, ensure that other like services are in compliance with our codes and services, and you can be assured that many of these conversations are presently happening.

**s 22** I look forward to meeting with you and **s 22** in two weeks' time to discuss these issues in greater detail.

**s 22** and her teams are also available to discuss implementation of age assurance, and the links with the phase 2 codes process as well as the new social media minimum age. As flagged at the meeting, eSafety is currently working on its framework for assessing whether services meet the criteria of 'age-restricted social media platform' and are therefore subject to the obligation to take reasonable steps to prevent under 16s from having accounts on their platforms. We will be writing to a range of services soon, including Roblox, to ask whether they have self-assessed their service as meeting this definition to assist eSafety with its assessment. Any initial views and rationale you might like to provide in the interim would be very welcome.

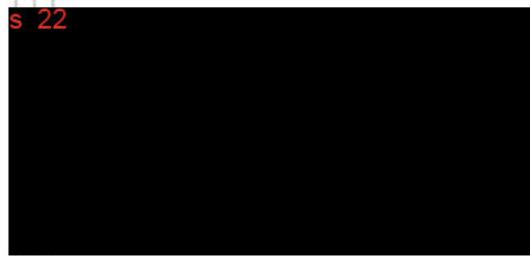
I look forward to connecting with those of you in US in September. Please contact **s 22** in my office to set something up.

Best wishes,

Julie

**Julie Inman Grant**  
Commissioner

**s 22**





Australian Government



eSa



eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past, present and future.

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**From:** [REDACTED] s 22  
**Sent:** Tuesday, 23 September 2025 2:50 PM  
**To:** [REDACTED] s 22  
**Cc:** [REDACTED] s 22  
**Subject:** Re: Following up on Julie's Stanford Trip (9/25-9/26) [SEC=OFFICIAL]

Hi [REDACTED] s 22

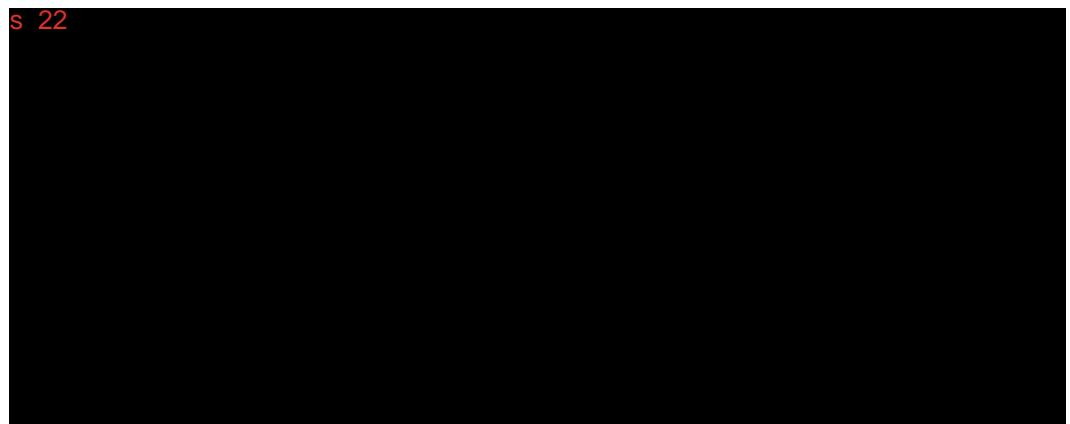
Thank you for your response. While we were looking forward to meeting Julie in California, we understand her schedule is very packed during this trip.

We will keep you updated on our safety efforts. Please share any future travel plans for the US.

Thank you.

Best,

[REDACTED] s 22



2025년 9월 23일 (화) 00:16, [REDACTED] s 22 [@esafety.gov.au](mailto:@esafety.gov.au) 님이 작성:

**OFFICIAL**

Hi [REDACTED] s 22

I am so sorry for not coming back to you. I think Julie has been in contact with [REDACTED] s 22

Due to the short duration of the US program, unfortunately there won't be time to meet on this occasion but please keep in touch and reach out if you need anything in the future.

Kind regards

[REDACTED] s 22

s 22

Executive Officer, Office of the eSafety Commissioner

M s 22

T s 22



eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses – land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

---

From: s 22

Sent: Tuesday, 16 September 2025 5:32 PM

To: s 22 <[@esafety.gov.au](mailto:@esafety.gov.au)>

Cc: s 22

Subject: Following up on Julie's Stanford Trip (9/25-9/26)

Hi s 22,

Thank you for your help in arranging the meetings with Julie in late August and early September. Those discussions significantly improved our understanding of her policy priorities and direction.

I am writing to follow up on Julie's upcoming trip to the US for the Trust and Safety Research Conference 2025 (September 25-26, 2025 at Stanford University).

As we discussed in our previous meetings with s 22, we would like to host Julie for a tour and lunch at Roblox Headquarters during that time.

Would you please let us know what her availability is like during this trip?

Thanks,

s 22



s



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**From:** eSafety Industry Supervision  
**Sent:** Thursday, 16 October 2025 7:22 PM  
**To:** s 22  
**Cc:** s 22 Julie Inman  
**Subject:** Grant; s 22 eSafety Industry Supervision  
**Attachments:** Preliminary assessment regarding Social Media Minimum Age [SEC=OFFICIAL]  
20251016 ROBLOX - ARSMP preliminary view letter.pdf

**OFFICIAL**

Dear s 22,

Please find attached correspondence from the eSafety Commissioner providing her preliminary assessment of Roblox.

Regards,

s 22

Manager, Industry Supervision



**eSafetyCommissioner**



eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses – land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

16 October 2025

s 22

Roblox

By email: s 22

Cc'd: s 22

Dear s 22

## Preliminary view that Roblox is not an age-restricted social media platform

1. I refer to our recent engagement concerning the social media minimum age obligation (**SMMA obligation**) in Part 4A of the *Online Safety Act 2021* (Cth) (**the Act**). As you are aware, the SMMA obligation comes into effect on 10 December 2025 and applies to ‘age-restricted social media platforms’.
2. As the eSafety Commissioner, I am required to monitor and promote compliance with the SMMA obligation. To assist industry and the public to prepare for the SMMA obligation, eSafety is engaging with services and encouraging them to assess whether they are an age-restricted social media platform using our [self-assessment tool](#). We are also separately assessing whether services are age-restricted social media platforms.<sup>1</sup>
3. The purpose of this letter is to:
  - a. notify you that eSafety has recently conducted an assessment of Roblox and has formed the preliminary view that Roblox is not an age-restricted social media platform;
  - b. give Roblox the opportunity to respond to our preliminary view and provide any submissions which may be relevant to our final assessment of Roblox before the SMMA obligation comes into effect; and
  - c. notify you that eSafety will be publicly communicating our preliminary view soon.

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<sup>1</sup> In the absence of any rules made by the Minister specifying a service as either an age-restricted social media platform or not an age-restricted social platform under ss 63C(4) and 63C(6)(b) of the Act respectively, any determination that a service is or is not an age-restricted social media platform is a matter for the court.

## Summary of preliminary view

4. After conducting a preliminary assessment of Roblox, eSafety has formed the preliminary view that Roblox is not an age-restricted social media platform for the following reason:
  - a. Whilst the conditions for an age-restricted social media platform in s 63C(1) and s 63C(6)(a) of the Act have been met, Roblox falls within one of the classes of services that is excluded from the SMMA obligation under the *Online Safety (Age-Restricted Social Media Platforms) Rules 2025* (**the Rules**) (s 63C(6)(b) of the Act).

## Material taken into account

5. In forming our preliminary view, eSafety has taken into account the following material:
  - a. relevant provisions in the Act and Rules
  - b. eSafety's Regulatory Guidance and self-assessment tool
  - c. internal eSafety user testing of the Roblox service
  - d. information on Roblox's website, as well as media releases and public communications
  - e. insights from relevant research or third-party reports, and other publicly available information
  - f. how Roblox's services are described in the Apple App Store and Google Play Store
  - g. Roblox's communications with eSafety, including Roblox's letter dated 15 September 2025 (**Roblox letter**).
6. In the Roblox letter, Roblox advised its view that:
  - a. Roblox does not fall within the definition of 'age-restricted social media platform'; and
  - b. in any event, it considers Roblox to fall within a class of services excluded from the SMMA obligation under the Rules.

## Reasons for preliminary view

7. An electronic service is an age-restricted social media platform if the following conditions are satisfied:
  - a. the sole purpose, or a significant purpose, of the service is to enable online social interaction between two or more end-users (s 63C(1)(a)(i)), and

- b. the service allows end-users to link to, or interact with, other end-users (s 63C(1)(a)(ii)), and
- c. the service allows end-users to post material on the service (s 63C(1)(a)(iii)), and
- d. material on the service is accessible to, or delivered to, end-users in Australia (s 63C(6)(a)), and
- e. the service is not an excluded service under the Rules (s 63C(6)(b)).

### **Roblox is an electronic service**

- 8. An 'electronic service' is defined in s 5 of the Act as:
  - (a) a service that allows end-users to access material using a carriage service; or
  - (b) a service that delivers material to persons having equipment appropriate for receiving that material, where the delivery of the service is by means of a carriage service;

but does not include:

  - (c) a broadcasting service; or
  - (d) a broadcasting service (within the meaning of the *Broadcasting Services Act 1992*).
- 9. 'Material' is also defined in s 5 of the Act and means material whether in the form of text, data, speech, music or other sounds, visual images (moving or otherwise) or in any other form or combination of forms.
- 10. 'Carriage service' is a service for carrying communications by means of guided and/or unguided electromagnetic energy.<sup>2</sup> In this case, the carriage service is the internet.
- 11. Roblox is an electronic service as it allows end-users to access material including games and other end-user generated material using the internet. Roblox also delivers that material to end-users using the internet.

### **Material is accessible to end-users in Australia (s 63C(6)(a))**

- 12. Material is accessible to, or delivered to, end-users in Australia if the end-users are physically located in Australia and the material is capable of being accessed by, or is received by, them.
- 13. Material on Roblox is accessible to, and delivered to, end-users in Australia.

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<sup>2</sup> *Telecommunications Act 1997* (Cth), s 7.

**The sole purpose of Roblox is to enable online social interaction between two or more end-users (s 63C(1)(a)(i))**

14. eSafety considers the current purposes of Roblox are:

1. To enable end-users to play online games with other end-users (**Purpose 1**)
2. To enable end-users to create and share online games and material with other end-users (**Purpose 2**)
3. To enable end-users to create, share, discover and explore immersive digital environments (**Purpose 3**)
4. To enable end-users to interact and communicate with other end-users on the service (**Purpose 4**).

Consideration of identified purposes and ‘online social interaction’

15. The relevant question is whether the above purposes can be categorised as online social interaction purposes (**OSI purposes**).
16. Online social interaction includes online interaction that enables end-users to share material for social purposes.<sup>3</sup> eSafety’s Regulatory Guidance and self-assessment tool detail our approach to considering what ‘online social interaction’ means practically, such as ‘an end-user’s engagement with other end-users or their material through an electronic service, whether active or passive, including by communicating, sharing material, participating in communities and/or expressing reactions’.<sup>4</sup>
17. Online social interaction does not include, for example, online business interaction or the sharing of material for business purposes.<sup>5</sup>
18. We consider that Purposes 1, 2, 3 and 4 are OSI purposes because they enable end-users to engage with other end-users or their material for social purposes (whether active or passive), and this engagement is the main type of interaction:
  - a. Purpose 1: To enable end-users to play online games with other end-users
    - i. Roblox’s core functionality is to allow end-users to play online games with other end-users in shared environments, and Roblox offers a vast catalogue of multiplayer games.
    - ii. Roblox opens to a personalised feed of ‘Games’ for end-users to discover and engage with. Roblox’s ‘Recommended for You’ algorithm on the Homepage provides end-users with personalised material that connects

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<sup>3</sup> s 63C(2).

<sup>4</sup> See Regulatory Guidance, p. 53; [Regulatory guidance | eSafety Commissioner](#)

<sup>5</sup> See Note 1 to s 63C; s 63(2).

end-users with Games based on, for example, Games the end-user has engaged with in the past.

- b. Purpose 2: To enable end-users to create and share online games and material with other end-users
  - i. Most Roblox Games are end-user generated. Roblox provides tools for end-users to create Games, including Roblox Studio and Roblox Developer.
  - ii. Roblox incentivises end-users to create and share Games through the Exchange Program, Roblox Developer Conference or Roblox Innovation awards.
  - iii. Roblox encourages developers to build Games that encourage end-users to spend time together in games.
  - iv. End-users can create and share Games, Avatar-items, and other end-user generated material using Roblox Studio and collaborative development tools.
- c. Purpose 3: To enable end-users to create, share, discover and explore immersive digital environments
  - i. Roblox's functionality enables the creation, sharing, discovery and exploration of immersive digital environments, referred to as 'Experiences'.
  - ii. Roblox allows end-users to create material on the service, including by way of:
    - creating a new Experience using the Roblox Studio function, where end-users can customise virtual worlds for personal exploration, or for sharing with other end-users on the service,
    - building personalised 'Avatars' and 'Avatar Items' to represent the end-user within Roblox Experiences across the service, where end-users can customise an Avatar's appearance, and, in some instances, create other 2D or 3D assets such as clothing and accessories, and
    - text-based material within the 'Experience Chat' and 'Direct Chat' functions, where text-based material can be created and shared publicly within Experiences, and within the 'Party Chat' function, where text-based material can be created and shared privately amongst befriended end-users only.
  - iii. Roblox opens to a personalised feed of Experiences for end-users to discover and engage with. To facilitate discoverability of Experiences on the service, Roblox deploys a recommendation algorithm that serves end-users content recommendations based on established end-user interests as defined by their past activity on the service, and the popularity of the Experience or content with other end-users across the broader Roblox service.

- iv. Roblox allows end-users to explore immersive digital environments by entering Experiences, where an end-user's Avatar 'spawns' into the digital environment where the end-user can then consume, generally wander around, or otherwise interact with the environment and other end-users within that environment.
- v. Roblox offers other immersive co-experiences, such as 'Party', which support persistent social play by allowing end-users to move between experiences together.

d. Purpose 4: To enable end-users to interact and communicate with other end-users on the service

- i. During gameplay, Roblox allows end-users to communicate with other end-users through in-game chat and in-experience chat. End-users can communicate with other end-users through text-based chat, appearing as 'bubbles' over an Avatar's head, direct messages between end-users, chat window communication between end-users and team-specific messages.
- ii. End-users can also communicate and engage with other end-users by viewing profiles, adding connections, and commenting on walls or forums.
- iii. Roblox allows end-users to actively engage with:
  - all end-users of the service within Experiences, by way of 'Experience Chat', where end-users can communicate within the Experiences using text-based functionalities, and 'Direct Chat', where end-users can communicate with end-users in a one-on-one capacity,
  - specific end-users using the 'Party Chat', where end-users can communicate by way of text-based material that is created and shared privately amongst befriended end-users only, and
  - end-users by way of 'Voice Chat' in Experiences where this form of communication is enabled by the creator of the Experience.
- iv. Roblox can also enable passive engagement with other end-users by way of Avatar animation features, where end-users can control their Avatar to 'physically' interact with other Avatars within Experiences. In addition, some Roblox Experiences allow camera connectivity to read and reflect an end-user's facial expressions onto their Avatar in real time, as a form of passive communication.
- v. End-users can create a personalised network of 'friends' on the service by actively requesting or accepting requests to befriend other end-users on the service. End-users are discoverable on the service by way of a search function, and public discoverability within Experiences. Roblox can also make network recommendations to users based on contacts as saved on their device.

'Online social interaction' is the sole purpose of Roblox

19. ‘Sole purpose’ means the only object for which anything exists or is done, made, used etc.<sup>6</sup>

20. Having regard to:

- a. the purposes of Roblox identified above; and
- b. that Purposes 1, 2, 3 and 4 are OSI purposes,

eSafety considers that enabling online social interaction between two or more end-users is the sole purpose of Roblox.

21. Even if this is not the *sole* purpose of Roblox, eSafety considers that, in the alternative, enabling online social interaction between two or more end-users is a *significant* purpose of Roblox.

‘Online social interaction’ is a significant purpose of Roblox

22. As set out in eSafety’s Regulatory Guidance, ‘a significant purpose’ is a purpose which is important and meaningful rather than one which is merely incidental or subsidiary.<sup>7</sup>

23. In assessing whether enabling online social interaction between two or more end-users is a significant purpose of Roblox, eSafety has specifically considered whether end-users would continue to use the service if the features and functions that enable online social interaction were removed or reduced. For example, Roblox has stated the primary purpose of Roblox is to enable end-users to play online games with other end-users.

24. Roblox includes various features which enable end-users to communicate with other end-users. In a recent product demonstration to eSafety, Roblox stated that “Communication is a central part of game play”<sup>8</sup>.

25. If the functionality that enabled these purposes were removed or reduced, it is unlikely that most end-users would continue to use Roblox.

26. Having regard to:

- a. the purposes of Roblox identified above; and
- b. that Purposes 1, 2, 3 and 4 are OSI purposes; and

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<sup>6</sup> See Regulatory Guidance, p. 53; [Regulatory guidance / eSafety Commissioner](#)

<sup>7</sup> Ibid.

<sup>8</sup> Roblox product demonstration to eSafety on 20 August 2025.

- c. that it is unlikely that end-users would continue to use the service if the features and functions that enable online social interaction were removed or reduced,

eSafety considers that enabling online social interaction between two or more end-users is a significant purpose of Roblox.

#### **Roblox allows end-users to link to and interact with other end-users (s 63C(1)(a)(ii))**

27. As identified at paragraph 18, Roblox allows end-users to link to, or interact with, some or all of the other end-users by communicating with them, moving between virtual experiences together, playing games together, adding connections, joining communities, and posting material.

#### **Roblox allows end-users to post material (s 63C(1)(a)(iii))**

28. As identified at paragraph 18, Roblox allows end-users to post material on the service, including posting comments, messages, or other material on Roblox through chats, forums, group walls, personal posts, or other features.

29. End-users can also create and publish games and other material for other end-users to access and interact with.

#### **Roblox falls within a class of excluded services (s 63C(6)(b))**

30. Section 63C(6)(b) of the Act states that an electronic service is *not* an age-restricted social media platform if the service is specified in the legislative rules.

31. On 29 July 2025, the Minister for Communications made the Rules specifying classes of services that are not age-restricted social media platforms.

32. Having considered the purposes of Roblox identified above, and in particular rule 5(1)(b), eSafety's preliminary view is that Roblox falls within one of the classes of services specified in the Rules.

33. Roblox is designed to enable end-users to play online games with other end-users. Roblox offers a vast catalogue of end-user generated multi-player games, many of which are designed for co-play. While Roblox enables end-users to create material, including Games and Avatar items, the number of end-users creating material is significantly smaller than the number of end-users using Roblox to play online games. In addition, while Roblox includes other features and functions such as messaging and communication, these are common ancillary functions found in online games. eSafety therefore considers the primary purpose of Roblox to be enabling end-users to play online games with other end-users.

34. However, eSafety will be maintaining a watching brief and engaging with Roblox over the coming months. Should we identify increased end-user engagement within Experiences that do not have gameplay features, or further features and functionality that do not involve gameplay, such that the primary purpose of Roblox may be considered to have

changed, we may reassess Roblox as no longer falling within a class of service specified in the Rules and therefore be required to comply with the SMMA obligations.

## Conclusion

35. For the reasons outlined above, eSafety's preliminary view is that Roblox is not an age-restricted social media platform.

## Next steps

36. Should you wish to provide further information for eSafety's consideration, please provide Roblox's response to eSafety's preliminary view by 24 October 2025. eSafety would particularly welcome any information Roblox can provide about the proportion of end-users engaging with Experiences vs Games.

37. eSafety proposes to publish on its website eSafety's preliminary view of whether certain services are or are not age-restricted social media platforms. That will include information about whether or not a service agrees with eSafety's assessment.

38. Please contact **s 47E(d)** [@esafety.gov.au](mailto:@esafety.gov.au) should you wish to discuss this letter further.

Yours sincerely



Julie Inman Grant  
eSafety Commissioner