

Google UK Limited

1 St. Giles High Street, London, WC2H 8AG, United Kingdom

Confidential

By post and email:

Mr Edmund Gritt South London Coroner's Service 2nd Floor, Davis House Robert Street Croydon CR0 1QQ

3 December 2025

Dear Edmund Gritt,

Regulation 28 Report to Prevent Future Deaths - Leo Alexander Barber

We refer to your Report to Prevent Future Deaths dated 9 October 2025 (the "**Report**"). This letter is our formal response to your Report.

We are deeply saddened to hear of the tragic circumstances relating to the death of Leo Alexander Barber. We understand from your Report that, prior to his death on 28 November 2023, Mr Barber accessed and used a website named "(the "Site").

At Google, safety is core to how we develop and operate our services, and we understand our responsibility to keep users safe, while still ensuring the free flow of information. Before we address section 101 of the Online Safety Act 2023 (the "OSA") specifically, we would like to take this opportunity to set out Google Search's approach to keeping UK users safe from suicide and self-harm content, as this is something we take extremely seriously, and is of course the subject of specific provisions in the OSA.

We hope this information is helpful although, for clarity, we note that your Report does not suggest that Mr Barber encountered the Site through search results on Google Search. In addition, while your Report indicates that Mr Barber opened an account on the Site using his Gmail address, it is the provider of the Site alone that determines who can sign up to the Site and access the material it hosts.



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Suicide and self-harm content

Google Search serves as an index of information on the open web. When an individual enters a search query, it uses algorithms to return search results linking to the relevant web pages in the index, ranked from most to least relevant.

In relation to suicide and self-harm content, Google Search takes a combination of approaches, including:

- maintaining content policies and prohibiting policy violative content in Search features. This includes, for example, prohibiting content in Search features that could directly facilitate serious and immediate harm to people;
- providing information and resources via hotline OneBoxes;
- providing specialised ranking approaches for suicide and self-harm queries;
- locking on SafeSearch and applying a UK specific filter for all known children to help remove harmful content from search results; and
- otherwise complying with Google Search's obligations under the OSA, which include risk assessment, search moderation and other obligations designed to keep UK users safe in respect of suicide and self-harm content.

We note that people use Google Search for suicide and self-harm-related queries for many different reasons, including looking for support to manage their thoughts in moments of crisis, or seeking information as to how to support loved ones. We recognise how important it is to increase awareness around help-seeking behaviours, while decreasing risk-taking and reducing stigma. We have therefore developed our approach to suicide and self-harm content through extensive consultation with both internal and external experts in psychology, mental health, and related areas. These include not only academics and clinicians, but also practitioners who provide direct services to vulnerable populations.

We remain committed to continually improving our services to prevent users from finding and experiencing illegal and harmful content, while also providing users with authoritative information on wide-ranging topics.

Section 101 of the OSA

The Report also refers to the Schedule 5 notice issued to Ofcom to exercise its power under section 101 of the OSA to obtain information from Google LLC regarding Mr Barber's online activity prior to his death.



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As communicated to Ofcom, the entity providing Google services to users based in the UK is typically Google LLC, a US company incorporated in Delaware. User data is therefore controlled by Google LLC and subject to US laws, including the US Federal Stored Communications Act (the "SCA"). As you may be aware, we informed Ofcom that we would not be able to comply with any formal notice, if one had been issued, to provide this information because the SCA prohibits the production of stored content absent limited exceptions, which were not considered to apply in this case.

We recognise the value of coroners such as yourself having access to information that is relevant to an inquest. We also recognise the importance of having fair and compassionate policies in place to ensure that parents and appropriate representatives have access to information connected to the death of a loved one. We are engaging actively with Ofcom and the Department for Science, Innovation and Technology on these issues.

In the meantime, to mitigate the issue, we make available an <u>Inactive Account Manager</u> tool, which allows users to designate third parties (such as immediate family members) to receive parts of their account data in the event of their death or inactivity. Otherwise, user data can still be obtained through the following channels:

- For criminal requests, law enforcement can make use of existing channels with the US government, such as submitting a request through the UK-US Mutual Legal Assistance Treaty or pursuant to the UK-US Cloud Act Agreement.
- For civil requests, relatives or administrators of a deceased's estate can apply for a US court order allowing Google to produce the stored content pursuant to applicable laws. Family members and representatives can contact us using Google's <u>public webforms</u>, and we support them by offering a direct channel of communication at the point at which they are eligible for a court order, as well as providing a template court order. Once a US court order is obtained and shared with Google, we expeditiously process the order.

If we can be of any further assistance on this matter, please do not hesitate to contact us.

Yours sincerely,

Legal Department Google UK Limited

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