

Navigating compliance with the UK's Online Safety Act



Ofcom is actively engaging in thorough and technical evaluations of online safety measures. Tackle compliance and enforcement with Keystone's proven technology-driven approach.



Deep understanding of Ofcom's priorities and processes

- Proven track record on regulatory strategy and engagement with the CMA and Ofcom.
- Enable clients to align technical compliance with broader legal and reputational priorities.



Keystone's multidisciplinary capability mirrors that of Ofcom

- Technologists work alongside economists to deliver model audits, detect illegal content, analyse user impact, and conduct safety-related evaluations.
- Extensive case experience in both the economics and technology of digital advertising.



In-depth technical expertise on algorithmic auditing, age verification, and user empowerment

- Deliver impactful analysis in algorithmic auditing, implementation of algorithmic systems, age verification and user analysis.
- Thought leadership on user empowerment, the intersection of algorithmic governance and the broader regulatory landscape shaping online platforms.

To arrange a presentation on Keystone's experience and insights, or to request more information, please reach out to stefan.hunt@keystonestrategy.com



Keystone has the technical expertise needed for compliance

AGE VERIFICATION AND USER ANALYSIS

- Conduct API audits, A/B testing and employ various audit methodologies to evaluate the performance of algorithms across different user categories, including children.
- Develop proprietary frameworks and metrics to analyse the appropriateness of content.
- Perform large-scale analyses of different output formats (video, voice).



Recent Keystone experience

Assessed a large social media recommender system for political bias; assessed a gaming company's age verification system; evaluated a large social media platform's approach to age verification for compliance with U.S. COPPA (Children's Online Privacy Protection Rule).

ALGORITHMIC CODE AUDITS



- Conduct audits and analyses of algorithms, data, and algorithmic decision-making to gain an in-depth understanding of content moderation and recommendation systems.
- Evaluate model implementations and input/output data mappings to determine impacts on recommendation system decisions.
- Demonstrated success in reviewing advertising technology source code.

Recent Keystone experience

Reviewed the source code of an ad tech infrastructure provider to assess technical justifications of certain conduct. Reviewed telemetry data of an AI chatbot to analyse usage patterns for the likelihood of certain user behaviour; applied machine learning interpretability techniques to identify essential features of a travel search algorithm.

ALGORITHMIC DECISION-MAKING DEPLOYMENT

- Keystone's data scientists and engineers design, deploy, and advise on compliant global ML systems across gaming, e-commerce and media streaming.
- Design and implementation of differential privacy.



Recent Keystone experience

Assessed one of the largest social media platform's advertising review system to evaluate the trade-offs between the need for algorithmic ad review and limitations of automation.

BEHAVIOURAL ECONOMICS

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- Thought leadership in Online Choice Architecture and user empowerment.
- Consumer behavior analysis and experimental design to understand user preferences and choice.
- Survey analysis to assess consumer deception in connection to public claims and consumer perception of influencers and how this affects consumer behavior.

Recent Keystone experience

Employed cutting-edge experimental techniques to evaluate the impact of choice screens on mobiles; evaluated whether customers were captive and unable to engage effectively in the fixed voice market for a landmark collective action in the UK.



Leadership and experts



Dr Andrea Coscelli
Partner & Head of Keystone Europe
London, UK

- Former Chief Executive of the UK Competition and Market Authority (CMA).
- Former Director of Competition Economics at Ofcom.
- Prior experience of several years in consulting.
- Globally recognized as one of the leading antitrust enforcers of the decade.
- Led the CMA's efforts in digital antitrust and competition cases.



Dr Stefan Hunt
Partner & Head of Keystone
Advanced Technology Europe
London, UK

- Former Chief Technologist at CMA – created and led the foremost team of technologists among competition agencies globally.
- Led initiatives on algorithmic auditing and online choice architecture.
- Founded the Financial Conduct Authority's behavioural economics and data science unit.



Junsu Choi
Partner, Keystone
Advanced Technology
Boston, MA

- Extensive experience in data science (including machine/deep learning), analysis of large-scale software (100M+ lines of code), reverse engineering, and network traffic analysis.



Rohit Chatterjee
Partner & Head of Keystone
Advanced Technology
Boston, MA

- Expertise in software and technology valuation, business strategy, and technological advisory work.
- Advised high-profile clients on online search, video games, APIs, smart home devices, and VR cases.

Keystone has 220+ behavioural scientists, economists, data scientists, computer scientists and a vast network of globally recognised experts



Cynthia Rudin
Professor of Computer Science,
Duke University

- Expert in designing machine learning models whose reasoning processes people can understand.
- Provided testimony on the design of a large social media platform's ad review process and metrics relevant for measuring its efficacy.



James Mickens
Professor of Computer Science,
Harvard University

- Worked as a researcher in the Distributed Systems Group at Microsoft Research.
- Provided technical testimony (OS Security) in Epic v Apple.
- Areas of expertise include systems code review and designing, building, and testing large, complex programs.

