Proposed Commitments to Fully Address Category 1 Issues in the Roadmap of Possible Measures dated 23 July 2025

5 February 2026

Google

Introduction and summary

1.   The CMA has explained that the Roadmap's Category 1 interventions seek to provide UK developers with confidence as to the operation of Google's app review, ranking, and use of data, to encourage UK developers to publish their innovative apps on Play as quickly and easily as possible.

2.   Google is completely aligned with the CMA's objective to have UK developers publish innovative apps on Play as soon as possible. Play has no incentive to prevent or disincentivise developers publishing innovative apps on Play. Today, developers prioritise Apple's iOS in development; it would be irrational and defy commercial sense for Play to discourage developers from publishing their innovative apps on Play. That is why Play is constantly seeking to help developers ensure that their Play apps reach their full potential.[1]

3.   Accordingly, Play has a wealth of policies and practices in place designed to give developers confidence over the operation of Play's app review, ranking, and use of data, so that developers are encouraged to publish their innovative apps on Play as quickly and easily as possible.[2] Google describes its existing practices and policies relating to app review, app ranking, and use of data in the **Annex** to this paper.

4.   As this paper explains, Google commits to maintaining these practices and policies in the future, and to reinforce them through additional measures. **Section I** sets out how Google will deliver enhanced confidence as to the operation of Play's app review, ranking, and use of data. **Section II** describes a reporting mechanism to the CMA.

I.   Google's proposed commitments

5.   Google will reinforce its existing practices and roll out additional measures for the duration of the designation period to give UK developers even greater confidence and clarity about Play's app review, ranking, and use of data.

6.   Google will prepare for the commitments set out in this paper to take effect from 1 April 2026.

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[1]   For example, *see* Android Developers Blog, From dashboards to deeper data: improve app quality and performance with new Play Console insights, 14 April 2025.

[2]   All apps listed on Play are required to comply with the Google Play Developer Distribution Agreement (**DDA**) and the Developer Program Policy (**DPP**), which are accessible in one place on the Play Developer Policy Center.

A. **Measures to ensure that Google continues to conduct its app review process in a fair, objective, transparent, and non-discriminatory manner**

7. Google will implement Play's app review practices based on its published policies,[3] fairly, objectively, transparently, and on a non-discriminatory basis. This will comprise the following measures:

   1. A public confirmation and assurance to continue implementing Play's app review practices based on Play's published policies, fairly, objectively, transparently, and on a non-discriminatory basis.

   2. Publishing an annual UK transparency report explaining the fair, objective, transparent, and non-discriminatory nature of Play's app review practices.

   3. Establishing a formal programme for engagement with UK developers to raise and discuss questions and issues relating to Google's app review process.

   4. Regularly informing UK developers about helpful resources relating to Google's app review process, and how to access them.

   5. Enhancing the visibility of the existing Platform-to-Business (**P2B**) alternative dispute settlement mechanism for UK developers, which enables developers to raise complaints relating to Google's app review process.

8. The remainder of this **Section I.A** describes how Google's proposed commitments relating to its app review process will work in practice.

   1. **Google will implement Play's app review practices in a fair, objective, transparent, and non-discriminatory manner**

9. Google will implement Play's app review practices fairly, objectively, transparently, on the basis of its published policies, and on a non-discriminatory basis. This will ensure Play's app review governing principles are visible and publicly accountable. Play app review will be conducted by a team separate from the teams that develop and innovate Google's first-party apps.

10. Google will invest in products and features designed to increase UK developers' confidence around Play's app review process, specifically:

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[3] *See* Google Play, <u>Developer Policy Center</u>.

a. **[Play Policy Insights](#) in Android Studio,** which provides bespoke, real-time policy guidance directly within the Android Studio coding environment. Play Policy Insights helps prevent technical policy violations and avoid delays later when the developer submits its app for review, by automatically flagging potential compliance issues as the developer is writing code. Google targets a 30% reduction in relevant policy violations by developers using this tool; and

b. **[Pre-Review Checks](#) in Play Console,** which allows developers to run an automated policy check on common policy violations, such as broken privacy policy links or missing login credentials, before they submit their app for review. Within only ~15 minutes, developers receive a report highlighting potential issues,[4] allowing them to get feedback to resolve potential issues almost instantly. This ensures developers can submit their apps with greater confidence and speed.

11. Google will be transparent regarding the operational speed of the review process.[5] Play provides transparency around the timings for the app review process on the Play Help Centre and the Play Console pages. Play's public documentation advises developers to "*adjust* [their] *planning to include a buffer period of at least a week between submitting* [their] *app and going live.*"[6]

12. After submitting their app for review, developers also have access to feedback regarding the status of their app in the 'Publishing Overview' page of the Play Console. Google will implement these transparency measures to enable UK developers who have submitted an app for review to confirm the app's publication status on the Play Console.

13. Google will review apps as quickly as possible—Google's incentives and app developers' incentives are aligned here. As Google already explains publicly, in some circumstances, Google will take more time to thoroughly review an app to help better protect users (for example, where an app belongs to a sensitive app category that might require deeper safety checks); this may result in review times of up to seven days or longer in exceptional cases.[7] Google's average app review times are significantly shorter. Google reviews millions of apps and app updates globally each month, with a recent average review time of less than one day.

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[4]   *See* Play Console Help, [Detect app issues early with pre-review checks](#).

[5]   *See* Play Console Help, [Publish your app](#).

[6]   *See* Play Console Help, [Control when app changes are reviewed and published](#).

[7]   *See* Play Console Help, [Publish your app](#).

2. Google will publish an annual transparency report explaining Play's fair, objective, transparent, and non-discriminatory app review

14. To ensure even greater transparency and accountability, Google will publish an annual (unless otherwise specified as bi-annual below) UK transparency report explaining Play's app review practices. Google will ensure UK developers and the CMA have ready access to the report by notifying them via email and/or through the Play Console, thereby providing them with greater visibility over Play's developments.

15. Google will provide the information set out below within three months following each bi-annual and annual reporting period. To align the reporting under these commitments with Google's global reporting practices, the first report (covering bi-annual metrics as specified below) will be available by 30 September 2026 and cover the reporting period 1 April 2026 to 30 June 2026. The first annual report will be available by 31 March 2027 (covering the period from 1 April 2026 to 31 December 2026).

16. The report will provide an overview of substantial changes made to Play's app review practices within the preceding calendar year (or the preceding six months in case of bi-annual reporting) and how they impact UK developers, including:

   a. An attestation that Google has implemented Play's app review practices fairly, objectively, transparently, on the basis of its published policies as set out under the ['Publish your app'](#) page of the Play Console, and on a non-discriminatory basis;

   b. An attestation that app review continues to operate independently from teams responsible for Google's apps and services;

   c. An overview of significant updates to Play's app review policies and/or enforcement practices with a material impact on UK developers, and an attestation that these updates were communicated in a timely manner;

   d. Aggregated, anonymised data on app review and enforcement for app developers, including submission volumes, rejection/suspension rates (Google will report this on a bi-annual basis);

   e. An overview of the primary policy areas or broad categories of issues associated with app rejections/suspensions;

   f. An aggregate annual number of internal complaints and appeals relating to app review that Play has received, and the proportion of decisions that Google upheld or reversed through the processes under Play's existing policies; and

g. Information on the resources and support channels available to UK developers to understand and comply with Play's app review policies.

3. Google will establish a formal programme for engagement with UK developers on Play's app review practices

17. Google will establish a formal programme to further engage with UK developers to raise and discuss questions and issues relating to Google's app review process. This programme will consist of:

   a. At least one roundtable event held annually, offering a forum for any interested UK developers of different sizes to engage directly with Play teams on issues relating to Play's app review process; and

   b. A dedicated page on UK developers in the #WeArePlay campaign, to highlight their success and innovation on Play.

4. Google will regularly inform developers about helpful resources relating to Play's app review process and how to access them

18. Google will provide UK developers with reasonable notice, allowing them sufficient time to make necessary changes, regarding material policy updates and new tools relating to Play's app review practices. Google will communicate these updates to UK developers, for example, via the Play Console, its official developer blogs, email, and Google's centralised policy announcements page.

19. Google will publicly announce upcoming policy deadlines on Play's policy deadlines page, alongside links to resources with guidance for developers on how to comply.

20. In addition, Google will provide reasonable grace periods for developers to bring their apps into compliance following a policy change. For certain complex policies, developers will also be able to request additional time to meet policy deadlines if needed.[8]

21. In Play's app review outcome notification, Google will provide UK developers with an explanation for any rejection of an app or update to an app, and continue its existing practice to support app developers with a swift resolution of issues identified under the review process.

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[8] *See* Play Console Help, Request more time to complete a policy declaration.

5.   Google will enhance the visibility of its existing appeal processes, including its independent alternative dispute resolution process for UK developers

22.   Google will maintain a robust internal appeals mechanism for any developer who disagrees with an enforcement decision.[9]

23.   Google will notify developers of the review outcome, regardless of the enforcement action taken. These notifications will be delivered via email and within the Play Console. The option to appeal will be explained in these communications, with a direct link to an intuitive, easy-to-use appeal form provided in the review outcome notification email, the Play Console, and Play's Help Centre pages. The review outcome notification email will also include a link to a survey for developers to provide feedback on the process. In addition, if a developer has a question or concern relating to the app review commitments set out in this paper, they will be able to reach Google through the general "Contact Us" form within the Play Console.

24.   When an appeal is submitted, a formal re-evaluation process will be initiated and the developer will be sent a response providing them with a case number and expected response time. The re-evaluation process will be handled by a reviewer with the relevant subject matter expertise who was not involved in the initial enforcement decision.

25.   When considering the claim, the reviewer's first step will be to re-evaluate the initial enforcement decision.[10] If the reviewer finds the enforcement was carried out in error, they will reverse the decision, and the developer does not need to take further action. If the reviewer confirms the original violation, they will then assess the appropriateness of the enforcement action based on the information provided in the appeal, the severity of the violation, and the developer's history of violations on Play.

26.   The reviewer will then communicate the appeal decision to the developer. Where relevant, this communication will include instructions on how the developer can republish their app or reinstate their account.

27.   In addition to this internal mechanism, Google will provide an independent alternative dispute resolution process that will be available for UK developers, in line with the retained Platform-to-Business (**P2B**) Regulation.[11] This existing framework will offer

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[9]   *See* Play Console Help, Enforcement Action; *see also* Play Console Help, Managing policy violations and appeals.

[10]   For information on potential enforcement actions, *see* Play Console Help, Rejections, removals, suspensions, and warnings.

[11]   *See* Centre for Effective Dispute Resolution, Google P2B Mediation Process.

access to independent, third-party alternative dispute resolution by the Centre for Effective Dispute Resolution (**CEDR**) for resolving disputes that cannot be settled by Play's internal appeals process, including those relating to Play's app review practices.[12]

28. Developers will be able to apply to mediate a dispute by filling out the application form on CEDR's website.[13]   This will include providing CEDR with contact information, the developer's app package name, a summary of their complaint, and their availability to mediate within 15-45 business days.

29. CEDR will then pass the complaint onto Google for review. Based on the information provided by the developer and the internal evidence Google already has on file for the initial enforcement action, Google will respond to the mediation request in one of the following ways:

   a. Reverse the initial enforcement action taken against the developer. In this case, no mediation is required, as the developer's appeal is successful.

   b. Agree to mediate the dispute. If a dispute proceeds to mediation, the outcome of the mediation is not binding on the developer or Google, and does not affect the developer's ability to pursue its complaint under any applicable laws. Any formal complaint about CEDR or any mediator nominated by CEDR should follow the CEDR Commercial Complaints Procedure.[14]

   c. Refuse mediation on the basis that the developer is clearly not in compliance based on the evidence Google has on file.

   d. Refuse mediation on the basis that the requests do not fall in scope of the ADSM.

30. CEDR maintains a panel of over 150 accredited mediators.[15] Google will seek to process complaints raised through the ADSM mechanism expeditiously and transparently. Mediation will be conducted in person within the UK or remotely via video conference, allowing participation from any location, and CEDR provides clear procedural rules and submission templates to guide developers through the process.[16]

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[12] CEDR offers resources to help developers understand the process. *See* CEDR, Model Mediation Agreement; Model Settlement Agreement. .

[13] *See* CEDR, Google P2B Mediation Process.

[14] *See* CEDR, Commercial Complaints Procedure.

[15] *See* CEDR, Centre for Effective Dispute Resolution.

[16] *See* CEDR, Google Play Mediation Scheme Preparation Guidance and Case Summary Template; Code of Conduct for Third Party Neutrals; and Model Mediation Procedure.

31. To ensure UK developers are fully aware of this existing channel as a route for redress regarding issues in relation to Play's app review, Google will seek to increase its visibility and accessibility by:

    a. Creating a dedicated page on the Google for Developers website and Play Console Help Centre, clearly explaining the P2B alternative dispute resolution process, eligibility, and how to apply and providing links to the application form, the rules, and other relevant materials;

    b. Referencing this alternative dispute resolution process, alongside Play's internal appeals process, in relevant communications to UK developers, such as app review rejection notices, to ensure developers are aware of all available appeal and resolution options; and

    c. Expressly stating that the P2B alternative dispute resolution process applies to complaints in relation to Play's app review practices, in line with Play's current policies.

    B.   Measures to ensure that Play's app ranking remains fair, objective, transparent, and non-discriminatory

32. Google will rank Play apps fairly, objectively, transparently, and on a non-discriminatory basis. This will comprise the following measures:

    1. A public confirmation and assurance to continue ranking Play apps fairly, objectively, transparently, and on a non-discriminatory basis.

    2. Publishing an annual UK transparency report explaining the fair, objective, transparent, and non-discriminatory nature of Play's app ranking practices.

    3. Establishing a formal programme for engagement with UK developers to raise and discuss questions and issues relating to Play's app ranking practices.

    4. Regularly informing UK developers about helpful resources relating to Play's app ranking process, and how to access them.

    5. Enhancing the visibility of its existing complaints processes regarding Play's app ranking.

33. The remainder of this **Section I.B** describes how these commitments relating to Google's app ranking process will work in practice.

34.   Google has procedural and operational safeguards in place to ensure that apps on Play will be ranked in a fair, objective, transparent, and non-discriminatory way. Play's app ranking will be based on three overarching criteria: (1) user relevance; (2) app quality; and (3) user experience.[17]   Play's algorithmic app ranking will apply non-discriminatorily to third-party and first-party apps.   It will operate independently from teams responsible for Google's own apps. Google will apply a rules-based and algorithmically driven app ranking system, which removes the scope for inconsistent manual treatment. This is essential to Play's business model. It is in Google's interest to ensure high-quality apps are promoted to users, as this improves their experience and builds trust in Play and Google's platform.

    a. **User relevance.** When a user searches for apps on Play, Google will establish the intent behind a user's query by deciphering the words typed and trying to determine if the user is looking for a specific app or a category of apps. Once Play has established a user's intent, it will use metadata (for example: title, description, and category) and other signals to determine which apps best address the user's query.

    b. **App quality.** Google will rank apps with strong technical performance and a good user experience higher than lower-quality apps. This is what Play users expect.   Users want high-quality apps that deliver a good experience and provide value. Google also values high-quality apps because when users have a positive experience with an app they install, they are more likely to trust the quality of all apps on Play.

    c. **User experience.** Google wants to ensure users have a positive experience when navigating Play, including search results, so they can discover the apps they want along with useful information about those apps. Google will therefore continue to consider the best user experience when determining how to group apps, where and how many ads to show in results, and the formats used to present apps to users. The more helpful and engaging the user experience is on Play, the more often users will return to discover and install new apps.

35.   Beyond algorithmic ranking, Play will feature apps in curated collections to help users discover high-quality, relevant content. These will include editorial features like "Editor's Choice," "Apps made in the UK", the "Kids section," and "Premium Games," which feature recommendations tailored to help users find the most relevant apps they are

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[17]   *See* Play Console Help, App discovery and ranking.

likely to enjoy. Google will select apps for these curated collections in a fair, objective, transparent, and non-discriminatory manner, to ensure that similarly situated third-party and first-party apps are treated the same way. The primary criteria for selection will be app quality, design, and overall user value. Google will also continue to consider additional factors like novelty, regional relevance, and broad audience appeal. Ad spend is not a relevant criterion for determining what apps are featured on Play.

36.   Google will ensure that developers understand how Play's app ranking works. Google will therefore continue to be transparent about these principles underpinning Play's app ranking.   This approach ensures that app ranking will be centered on measurable indicators of app quality, like ratings, reviews, engagement, and technical performance. It will also ensure a level playing field where developers are incentivised to compete on the quality of their product, not on their ability to manipulate ranking signals.

37.   Google will invest in products and features designed to increase UK developers' confidence around how Play ranks apps. While specific ranking algorithms must remain confidential to guard against the risk of manipulation and ranking abuse, Google will provide sophisticated tools that give developers transparency into the primary drivers of visibility on Play, for example:

a.   **Acquisition Reports**. This tool provides transparency into traffic sources, revealing the specific search terms users type to find an app. This gives developers direct insight into the keywords driving their visibility, helping them understand the connection between user intent and their ranking.

b.   **Promotional content**. This tool empowers developers to proactively increase their visibility by showcasing major updates or events (such as limited-time offers) and explicitly requesting that they be featured on high-traffic surfaces like the Play homepage. To ensure transparency in this process, Play publishes the objective criteria used to evaluate these requests,[18] and provides guidance on how to build feature-worthy apps,[19] giving developers a clear roadmap to achieving top-tier visibility.

c.   **Store Listing Experiments**. This feature enables developers to run A/B tests on their store listing assets (such as icons, screenshots, and descriptions) to determine what resonates with users. This gives developers data-driven control over their conversion rates, allowing them to optimise how their apps perform in Play's ranking systems.

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[18]   *See* Google Play, Getting featured on Google Play.

[19]   *See* Android Developers, Build high-quality apps and games.

d. **Android Vitals**. This provides developers with visibility into technical performance metrics about their app, such as crash rates and battery usage–which are quality signals for ranking. By surfacing these metrics, Android Vitals allows developers to directly identify and fix technical issues that might otherwise negatively impact their app's visibility or search performance.

2. Google will publish an annual transparency report explaining Play's fair, objective, transparent, and non-discriminatory app ranking

38. To ensure even greater transparency and accountability, Google will publish an annual UK transparency report explaining Play's app ranking practices. Google will ensure UK developers and the CMA have ready access to the report by notifying them via email and/or through the Play Console, thereby providing them with greater visibility over Play's developments, including those specifically relating to its app ranking practices.

39. The UK report will provide an overview of substantial changes made to Play's app ranking practices within the preceding year and how they impact UK developers, including:

a. An attestation that Google has ranked apps on Play fairly, objectively, transparently, and on a non-discriminatory basis;

b. An overview of significant updates to Play's app ranking policies and/or enforcement practices with a material impact on UK developers and a high-level description of Google's rationale for these changes;

c. Aggregated, anonymised data on complaints relating to app ranking on Play, and the broad categories of issues associated with these complaints; and

d. Information on the resources and support channels available to UK developers to understand and comply with Play's app ranking policies.

3. Google will establish a formal programme for engagement with UK developers on Play's app ranking practices

40. Google recognises the importance of the UK app economy and will establish a formal programme to further engage with UK developers to raise and discuss questions and issues relating to Play's app ranking process. This programme will consist of at least one roundtable event held annually, offering a forum for any interested UK developers of different sizes to engage directly with Play teams on issues relating to Play's app ranking.[20]

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[20] The roundtable will cover issues relating to app review, app ranking, and use of data.

4. Google will regularly inform developers about helpful resources relating to Play's app ranking and how to access them

41. Google will provide developers with the information they need to succeed, and provide public guidance and documentation on the principles that drive app ranking, such as app quality and technical performance. To achieve this, Google will be transparent about the principles of Play's app ranking system:

    a. Google will explain the key factors Play considers on the [developer help pages](), with a strong emphasis on app quality, relevance, and user engagement.

    b. Google will support this through a robust outreach program—including online training courses, webinars, and the Play Academy—that provides actionable guidance on improving quality metrics like stability and performance.

    c. Google will back these measures up by a powerful suite of testing and analytics tools in the Play Console, allowing developers to put Play's guidance into practice.

42. Google will provide UK developers with reasonable notice, allowing them sufficient time to make necessary changes, regarding policy updates and material changes relating to Play's app ranking. Google will communicate material updates proactively and clearly, for example via the Play Console, its official developer blogs, email, dedicated sessions at developer events, and Google's centralised policy announcements page.

43. Google will explain on the Play Help Centre pages the factors Google considers when organising apps in Play's ranking, and how Google may weigh these factors in different circumstances.[21] This transparency measure will need to be balanced carefully against potential negative unintended consequences for developers and users. Play's ranking processes are highly technically complex and based on a wide range of inputs. Disclosing any more detail than what Google makes available currently would expropriate Play's IP, reduce the quality of Play, and damage competition.

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[21]   *See* Play Console Help, [App discovery and ranking]().

5. **Google will enhance the visibility of its existing complaint handling processes for app ranking**

44. Google will maintain a clear process for developers who have questions or concerns about their app's ranking. This process will be built around investigation, transparency, and fairness.

45. If a developer has a question or concern about their app ranking—typically because they believe it does not accurately reflect the app's quality, relevance, or user engagement—they can reach Google through several channels, specifically:

    a. The general "Contact Us" form within the Play Console, which developers will also be able to use if they have a question or concern relating to app ranking and/or the app ranking commitments set out in this paper; and

    b. The dedicated support page for app ranking, which contains a link to the same help form.

46. When Google receives a query, it will examine the relevant ranking signals to ensure the system is working as intended. There would be two primary outcomes from this investigation:

    a. If a system-level issue is identified, Google's engineering teams will address it. Google then informs the developer that an issue was identified and fixed.

    b. If the system is working correctly, Google provides the developer with guidance on factors that can affect app ranking and advice on how to improve.

47. Google will not artificially boost an individual developer's ranking in response to a complaint. If a fix is needed, it is a systemic one to ensure the algorithm works as designed for everyone.

48. In addition to this direct support, Google will offer other avenues for UK developers to raise concerns relating to their apps' ranking:

    a. If a developer believes another app violates policies to gain an unfair advantage, Google will make available a form on Play's website for developers to report the app for investigation.[22]

    b. Google will also make available the Google Play Developer Help Community, a forum monitored by Play's community managers, for developers to post questions relating to app ranking.

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[22] *See* Play Console Help, Report a policy violation.

Measures to ensure that Google does not use non-public Play data to give its own apps a competitive advantage

49.   Google will implement Play's data practices, fairly, objectively, transparently, and on a non-discriminatory basis, in line with its internal data policies and published Business Data Responsibility site. This will comprise the following measures:

1.   A public confirmation and assurance to continue implementing Play's data practices fairly, objectively, transparently, and on a non-discriminatory basis.

2.   Publishing an annual UK transparency report explaining the fair, objective, transparent, and non-discriminatory nature of Play's data practices.

3.   Establishing a formal programme for engagement with UK developers to raise and discuss questions and issues relating to Play's data practices.

4.   Regularly informing UK developers about helpful resources relating to Play's data policies, and how to access them.

5.   Enhancing the visibility of its existing complaints processes regarding the use of developer data.

50.   The remainder of this **Section I.C** describes how Google's commitments relating to Play's use of data will work in practice.

1.   Google will implement Play's data practices in a fair, objective, transparent, and non-discriminatory manner

51.   Google will safeguard third-party developers' non-public data received in the context of Play's app review process and non-public data Google has access to from Play's operation as an app store. Safeguarding mechanisms will comprise the following:

a.   Google will safeguard such data in line with its internal data policies and published Business Data Responsibility site. These policies strictly prohibit the inappropriate use of Play developer data. They also prohibit Google employees from sharing, copying, or otherwise further distributing that data after they have gained access. These policies will be supported by Google's Employee Code of Conduct, which mandates strict compliance subject to disciplinary action.

b.   Google will support its data use policies with tried-and-tested technical access controls which prevent non-compliant data access and use. These robust controls will technically gate data access, and ensure that data is only accessed and used for a specific and compliant purpose, in line with Google's internal data policies. In more detail:

i. Google's technical access controls will be designed to refuse data access by default.

ii. To gain access, Google employees and teams will be required to submit an access request detailing: (i) the intended use case for the data; and (ii) a completed acknowledgement of Google's internal data policies.

iii. Google's data access owners will assess the access request, and will grant access only where the specified use case is appropriate and compliant with Google's data access policies.

c. Alongside these access control systems, Google will operate complementary systems that serve to protect the integrity of Google's access controls by validating and recording the identity of the user or process when requesting authorisation and when accessing data. These access logging/auditing tools will enable Google to validate that data has not been misused, by validating and recording the identity of the user or process accessing data.

d. Google will deploy training for relevant data access owners to ensure access to such data is only granted consistent with Google's policies.

52. Google will not use non-public Play data to support the development of its first-party apps.

2. Google will publish an annual transparency report explaining the controls it has in place to prevent developer data misuse

53. To ensure even greater transparency and accountability, Google will publish an annual UK transparency report explaining Play's data practices based on the core principle that Google does not use non-public Play data to give its own apps a competitive advantage. Google will ensure UK developers and the CMA have ready access to the report by notifying them via email and/or through the Play Console, thereby providing them with greater visibility.

54. The UK report will provide the following:

a. An overview of substantial changes made to Play's data policies within the preceding year and how they impact UK developers; and

b. An attestation that Google has maintained processes to safeguard third-party developers' non-public data in a fair, objective, transparent, and non-discriminatory manner, and in line with the data use commitments set out in this paper.

3. Google will establish a formal programme for engagement with UK developers on Play's data policies

55. Google recognises the importance of the UK app economy and will establish a formal programme to further engage with UK developers to raise and discuss questions and issues relating to Play's data policies and practices. This programme will consist of at least one roundtable event held annually, offering a forum for any interested UK developers of different sizes to engage directly with Play teams on issues relating to Play's data policies.[23]

4. Google will regularly inform developers about helpful resources relating to Play's data policies and how to access them

56. Google will provide UK developers with reasonable notice, allowing them sufficient time to make necessary changes, regarding policy updates and material changes relating to Play's data policies via the Play Console and its official developer blog. Where Google materially changes its data policy terms, it will provide developers with reasonable notice, allowing them sufficient time to make necessary changes. The DDA already requires this.

5. Google will enhance the visibility of its existing complaints processes regarding the use of developer data

57. Google will operate a dedicated channel through which UK developers can submit requests for support, including questions and concerns relating to the use of their non-public data. The complaints channel includes a free-text field which allows UK developers to describe their issue, including questions or concerns relating to the data use commitments set out in this paper. This channel is monitored by Google's teams who help triage the request.

II. Google will establish a reporting mechanism to the CMA using metrics that help show compliance with these commitments in respect of app review, app ranking, and data use

58. Google will set up a reporting mechanism to ensure the CMA can have confidence in the effectiveness of Google's proposed commitments and the underlying processes. To that effect, Google will provide the CMA with a confidential report, on an annual basis (unless otherwise specified as bi-annual below) for the duration of the designation period, containing core metrics to demonstrate ongoing compliance.

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[23]   The roundtable will cover issues relating to app review, app ranking, and use of data.

59.   Google will provide the information set out below within three months following each bi-annual and annual reporting period. To align the reporting under these commitments with Google's global reporting practices, the first report (covering bi-annual metrics as specified below) will be available by 30 September 2026 and cover the reporting period 1 April 2026 to 30 June 2026. The first annual report will be available by 31 March 2027 (covering the period from 1 April 2026 to 31 December 2026).

60.   In relation to its **app review practices**, Google's confidential annual UK report to the CMA will cover:

    a. **Audit metrics** to verify that key processes are operating as intended:

        i. Summary metrics relating to the usage of Google's support, resources, and tools offered to UK developers. Specifically:

            1. Data verifying the publication of new developer guidance, such as the number of policy Help Centre pages or policy clarifications published;

            2. Metrics verifying the timely publication of developer-facing notifications of material changes to Play's review criteria;

            3. Data on the number of Google Play Academy course beginnings and completions by developers;

            4. Usage metrics for tools that Google provides for developers to get feedback on their compliance with Play's policies (*e.g.*, Play Policy Insights), such as the number of monthly active users;

            5. Technical control metrics related to Google's policy feedback tools (*e.g.*, Play Policy Insights), for example, the number of technical outages and the duration of those outages / periods of technical difficulty;

            6. Metrics on the frequency and timing of alternative dispute processes through CEDR; and

            7. An overview of significant updates to Play's app review policies with a material impact on UK developers, and the rationale for any such updates.

b. **Outreach metrics** to show the effectiveness of Google's transparency and support outreach with UK developers, including information on support, resources, and tools offered to UK developers, and updates on any material changes:

    i.   Description of outreach that took place over the last reporting period (*e.g.*, the number of workshops/roundtables conducted with UK developers, and associated data on attendance and participation);

    ii.   The number, and an anonymised description of the nature (*e.g.*, size, type of app offered) of developer attendees at UK-hosted webinars on policy issues;

    iii.   A description of principal material developer requests raised with Google during outreach programmes; and

    iv.   Reporting on the amplification of UK developer success, (*e.g.,* the number of UK-based developers featured in the [#WeArePlay](#) campaign or on Play blogs).

c. **Output metrics,** including aggregated data on the results of key processes:

    i.   Aggregated data on average and median time taken for app review, including any formal internal timing targets for Play's app review that Google may set in the future. Google will report this on a bi-annual basis;

    ii.   The total number of developer complaints and appeals Google received about Play's app review, including a high-level categorisation of the types of complaints received, and aggregated data on app review complaint outcomes (*i.e.*, rejections and approvals). Google will report this on a bi-annual basis;

    iii.   An overview of the types of developers raising complaints; and

    iv.   The median time needed to action a complaint. Google will report this on a bi-annual basis.

61. In relation to its **app ranking,** Google's confidential annual report to the CMA will cover:

    a. **Audit metrics** to verify that key processes are operating as intended:

        i. A summary description of objectives of Google's ranking; and

        ii. A summary description of any operational measures Google has taken to ensure apps on Play are ranked fairly, objectively, transparently, and on a non-discriminatory basis.

    b. **Output metrics,** including aggregated data on the results of key processes:

        i. The total number of developer complaints Google received through Play's dedicated channel about Play's app ranking specifically, and a high-level description of the outcome of these complaints. Google will report this on a bi-annual basis; and

        ii. A description of the function of the ranking process, namely user relevance, app quality, and user experience.

62. In relation to its **third-party developer data policies,** Google's confidential annual report to the CMA will cover the following **output metrics,** including aggregated data on the results of key processes:

    a. The total number of developer complaints Google received through Play's dedicated channel about Play's third-party developer data policies. Google will report this on a bi-annual basis;

    b. Any major incidents relating to the safeguarding of third-party developers' non-public data (*e.g.,* material identified breaches of the policy). Google will report this on a bi-annual basis; and

    c. A summary of the access logging/auditing tools that Google carries out in accordance with the commitments in this paper.

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