Submission in response to OFCOM's call for evidence regarding "Researchers' access to information from regulated online services"

CELE

Enero de 2025

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January 14, 2025

At CELE, we welcome OFCOM's call for evidence on data access for researchers under the UK Online Safety Act. This presents a timely opportunity to deepen the analysis of data access obligations and evaluate both existing and alternative frameworks. Public consultations like this are essential to ensuring the effectiveness and transparency of the OSA regime.

I. How, and to what extent, are persons carrying out independent research into online safety related issues currently able to obtain information from providers of regulated services to inform their research?

The ability of independent researchers to obtain information from digital platforms regarding online safety matters is potentially constrained by substantial barriers. [The experience of Linterna Verde, a Colombian organization studying digital public debate, provides a compelling case study that illustrates these limitations in practice](.

Meta's data library, while representing one of the most promising tools available to researchers, exemplifies the complex challenges faced when attempting to access platform data. Based on Linterna Verde's documented experience, obtaining access requires navigating a demanding multi-step process that creates significant barriers to entry. The approval process demands researchers present well-defined projects while meeting stringent qualification requirements. As Laura Palacio from Linterna Verde notes, Meta's evaluation focuses heavily on the research leader's profile, requiring an extensive background in data management and analytical tools, which can exclude qualified researchers who lack specific technical expertise.

As observed in Linterna Verde's case, the access mechanism itself imposes notable operational constraints. For instance, authorization is restricted to specific individual Facebook profiles, which complicates collaborative research efforts. In this vein, adding new researchers to a project requires submitting separate approval requests, creating unnecessary administrative burdens. The organization's experience indicates that a more efficient approach would allow research institutions to manage access internally while maintaining appropriate security protocols.

Technical requirements typically present additional hurdles: researchers must take specialized courses and meet various technical specifications. Linterna Verde's application process

extended between six to eight weeks, including an initial rejection and subsequent adjustments. Even after gaining access, researchers face significant limitations in data utility: the library restricts access to comments and commenter identities, lacks direct links to often force researchers to rely on manual searches, making the research process "difficult and tedious", as Palacio mentioned.

There are, additionally, economic aspects that present significant barriers. As highlighted by Linterna Verde's leadership, platforms must manage extensive server infrastructure requiring substantial resources. The associated costs, combined with platforms' perceived lack of benefit from providing unrestricted access, create additional obstacles to comprehensive research access.

Furthermore, the challenge of data interoperability between platforms hampers research capabilities. Namely, the inability to effectively combine and compare data across different services limits researchers' capacity to conduct comprehensive analyses of online safety issues. This limitation is particularly problematic when investigating cross-platform phenomena or attempting to understand broader patterns in online behaviour.

As highlighted by Linterna Verde's experience, the current landscape of platform data access demonstrates that even when formal access mechanisms exist, they remain prohibitively complex and restricted. This situation particularly affects organizations from regions with limited resources, creating an imbalance in research capabilities and understanding of online safety issues.

II. What kinds of online safety research does the current level of access to information enable? What type of independent researchers are carrying out research into online safety matters? What topics/issues they are researching?

As per Section 162(2) of the OSA, a person carries out independent research when they do so "on behalf of a person other than a provider of a regulated service". Any guidance OFCOM produces in this matter must keep the definition of "independent research" as broad as possible.

Not all research on the risks posed by the design and operation of platforms is conducted by academics. A significant portion of it is carried out by think tanks, non-governmental organizations (NGOs), and civil society at large. Civil Society Organizations (CSOs) are often deeply engaged with the practicalities of regulatory implementation and involved in day-to-day dialogues with different (state and non-state) stakeholders. They frequently possess specialized expertise in specific issues—sometimes surpassing that of the regulators themselves. As a result,

CSOs can bring an innovative perspective to research, posing practice-oriented research questions pointing at addressing the most pressing needs of the DSA implementation.

Moreover, research on online safety is also done by think tanks, independent policy experts, trust and safety service providers, international organizations, and state actors.

Any guidance OFCOM produces that facilitates data access for researchers ought not to subject access to data to the condition that the research carried out in connection with a specific topic/range of topics (see, for instance, article 40 of the Digital Services Act that explicitly states that researcher's access to data is limited to research). More research on the economic, social, organizational, and other aspects of platforms' functioning and utilization will contribute to a better understanding of the financial and regulatory incentives they respond to, the societal dynamics that drive their users' behavior, and the main threats to the enjoyment of human rights online.

III. Are there types of information that independent researchers are currently unable to access that may be relevant to the study of online safety matters? If so, what are they and what kind of research would they facilitate?

The lack of standardization and transparency in accessing digital platform data presents a significant challenge for researchers, particularly in the field of online safety. These challenges manifest across multiple dimensions that collectively impede comprehensive research efforts.

A fundamental obstacle lies in the fragmented nature of data ecosystems across platforms. Each platform maintains its own distinct data architecture, severely limiting researchers' ability to conduct comparative analyses across different services. [As highlighted by Carlos Cortés, director of Linterna Verde](), platforms show limited interest in providing unrestricted data access, citing the substantial economic and resource costs associated with server management.

The precarious nature of existing data access tools further compounds these challenges. Recent developments with tools such as CrowdTangle and Twitter's API illustrate this vulnerability. Meta has significantly restricted access to CrowdTangle, reducing its utility for researchers, while Twitter's introduction of API access fees has created additional barriers, particularly affecting researchers working with limited resources.

Even when platforms offer dedicated research facilities, such as Meta's data library, researchers face complex and demanding access procedures. These processes require researchers to present robust project proposals, demonstrate expertise in data management and analytical tools, complete specific training courses, and meet technical requirements. Furthermore, even after gaining approval, researchers encounter limitations in data updates and scope, which constrain their ability to conduct timely and comprehensive research.

Researchers from the Global South face additional challenges due to resource constraints, inadequate infrastructure, and limited funding. This disparity creates a significant research gap that hampers accurate comparative studies and the identification of trends between the Global North and South.

To address these challenges, several key interventions are necessary. The establishment of clear regulatory frameworks defining platform data access conditions is crucial for ensuring transparency and enabling rigorous independent research. The definition of "researcher" should be expanded to acknowledge the valuable research conducted by civil society organisations and journalists, granting them equal access to data alongside academic researchers.

Promoting North-South collaboration is essential for addressing regional disparities. This could include facilitating joint research proposals and providing support mechanisms to help Global South researchers overcome resource barriers. Furthermore, fostering open dialogue between platforms, researchers, regulators, and civil society is crucial for addressing concerns about data protection, user privacy, and research ethics.

The standardisation of available platform data should encompass both quantitative and qualitative data types, enabling deeper, contextualised understanding of online phenomena. Equitable access to digital platform data is fundamental for independent research and digital accountability. Achieving this requires coordinated effort to overcome existing barriers and build a more transparent, inclusive, and responsible research ecosystem.

IV. What are the challenges that currently constrain the sharing of information for the purpose of research into online safety related issues?

The main challenge remains the privacy of the users whose information is shared.

V. What are the technical challenges relating to sharing information from online services with independent researchers? What are the challenges relating to the scale and complexity of the information involved?

The information shared need not be large or complex. Researchers will have ahead of them the tasks of assessing the information needed for their research projects and tailoring their information requests to those needs, so they do not get more information than they are able to process or handle. In such a case, they should have the chance to refine or amend their request. Meaningful research extends beyond easily quantifiable metrics, and researchers investigating nuanced or complex social dynamics must be equally empowered to contribute to our

understanding of digital platforms. To effectively assess risks to online safety, a more profound and contextualized understanding is imperative.

Critical research questions such as "How do users perceive platforms' content moderation policies and how do these policies impact their online behavior?" demand a robust qualitative research approach. To comprehensively evaluate platform governance, researchers must move beyond numerical aggregations and engage in in-depth analytical methodologies.

For instance, a purely quantitative study focusing solely on the number of posts removed for "disinformation" would be insufficient to determine the fairness, accuracy, or consistency of moderation decisions. Conversely, qualitative analysis enables a comprehensive assessment of whether platform policies are inappropriately censoring legitimate content. Access to data such as the posts' content, user interactions, comments, and content moderation strategies would let researchers analyze online discourse, identify behavioral patterns, understand user perceptions, and—ultimately—evaluate platform policies' real-world implications.

It could be the case that the data required by researchers is in fact large and complex. In such a case, it would be useful to take into account that the realities faced by researchers worldwide are diverse and complex. If the conditions to access data are set to a high bar, they would impose significant challenges for researchers in the Global South, adding another layer of barriers to data access for those who already face more significant difficulties in researching digital platforms. It is essential to consider that an underlying factor that differentiates researchers from the Global North and the Global South is their access to infrastructure and funding, fundamental parts of data collection and processing.

In this regard, we recommend that the conditions established for researchers to access the data take into account the resource scarcity faced by researchers outside of the Global North. Therefore, the possibility of north-south and south-south collaboration between researchers would be key for Global South researchers to achieve impactful research. The delegated regulation issued by OFCOM should explicitly include provisions accepting joint applications by teams of researchers affiliated with different institutions, even based in different countries.

VI. Are there any models or arrangements that exist in the online services industry already that might provide increased access to information for research purposes if applied more generally across the industry? If so, what

are these and what are the benefits and disadvantages of these models/arrangements?

Models like APIs for researchers, apps like former Crowdtangle, ad repositories and content libraries can be useful resources for researchers. However, the challenges reported in question III remain and demonstrate the need for further regulation in the area.

VII. What are some possible models for providing researchers with access to relevant information that may not exist or be widely used yet, but which might be implemented by industry?

Drawing from European Center for Nuclear Research's (CERN) experience, the establishment of a sort of Information Environment Research Initiative (IERI) could serve as a cornerstone initiative for providing researchers with access to relevant information and other research resources. This multinational, interdisciplinary research center would focus on studying the information environment and its impact on democracy. The Institute would provide cutting-edge data engineering and analysis tools. Through international collaboration, it would facilitate knowledge exchange and research network development while offering comprehensive training programs for researchers, policymakers, and CSOs. The Institute's sustainability would be ensured through a diversified funding model combining government support, private sector contributions, and philanthropic partnerships.

Complementing this institutional framework, Data Cooperatives could be developed where technology companies would share anonymized data with accredited researchers under regulatory supervision. These cooperatives would implement standardized protocols for data collection, processing, and sharing, ensuring interoperability and comparability across platforms while maintaining robust privacy safeguards through anonymization and strict access controls.

To facilitate practical research applications, Data Sandboxes could be established as controlled environments where researchers can work with real platform data under stringent security and privacy protocols. These environments would enable scenario simulation and risk assessment of new technologies — thus providing valuable insights for policy development and intervention strategies.

Additionally, the establishment of Dedicated Research Funds would be crucial for supporting independent Internet governance research, with particular attention to Global South researchers' needs. These funds would provide infrastructure grants and research fellowships,

enabling broader participation in international research initiatives and fostering global collaboration.

Essential to these models' success would be the implementation of robust transparency and accountability mechanisms, ensuring public oversight and civil society participation. Notwithstanding its benefits, such oversight mechanisms should not hinder the research process. For instance, the implementation of independent ethics committees, while useful for evaluating research proposals to protect user rights, might simultaneously impose excessive bureaucratic burdens on smaller organizations and/or independent researchers.

VIII. What role could third party organisations, such as regulatory bodies, civil society or public sector organisations have in facilitating researcher access to online safety information?

When examining barriers to information sharing for research purposes, the volatility of civil society funding represents a significant constraint, particularly in Latin America and the broader Global South (for further discussion, see [Internetlab's interview with Agustina Del Campo, CELE's Director](#)). This challenge manifests in several interconnected ways that fundamentally affect research quality and sustainability.

CSOs in these regions often rely heavily on external funding sources, which substantially influence their research focus areas. When funder priorities shift, CSOs may be compelled to redirect their research efforts, even when certain topics remain critically relevant. This dependency creates significant obstacles for long-term research initiatives and consistent knowledge generation about online services, ultimately limiting these organizations' ability to provide regulators with comprehensive evidence.

The absence of stable funding streams significantly affects research infrastructure within Latin American CSOs. This limitation manifests in reduced capacity to meet technical requirements for handling sensitive data, insufficient resources for maintaining adequate security protocols, and limited ability to participate in data-sharing arrangements. These infrastructure constraints create substantial barriers to participating in research activities that require robust technical capabilities and security measures.

Furthermore, the resource disparity between Global North and South research institutions creates a significant research gap. This disparity particularly affects Latin American researchers' participation in global platform regulation debates and the representation of Global South perspectives in international policy discussions. The resulting imbalance means that critical regional perspectives and experiences are often underrepresented in global discussions about platform regulation.

To address these challenges effectively, it is essential to develop sustainable funding mechanisms specifically targeted at Global South research institutions while creating equitable frameworks for international research collaboration. Additionally, establishing infrastructure support programmes would enable compliance with data-sharing requirements. These measures would contribute to more effective approaches to online safety challenges while ensuring diverse global perspectives inform regulatory frameworks. The development of more sustainable and equitable funding models for Global South research is crucial for addressing online safety challenges effectively and ensuring truly global perspectives in regulatory approaches.

IX. What categories of information should online service providers give researchers access for the study of online safety matters? Why would this information be valuable for the study of online safety matters?

Any regulation issued on mandatory data access should include a set of categories of information that companies must share with researchers, but should not be limited to those. As a general rule, companies should share with researchers all the information they have or can easily produce, absent trade secrets or user privacy reasons. A dispute settlement mechanism should be set up to resolve controversies arising from denied requests.

The categories of information should be crafted to enable different kinds of research besides those quantitative-oriented dealing with big quantities of data. Qualitative data is as important and this should be reflected in the categories of information proposed.

Call for evidence response form

Please complete this form in full and return to researcheraccess@ofcom.org.uk.

Consultation title	Call for Evidence: Researcher Access to Regulated Online Services Information
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Representing (delete as appropriate)	Organisation
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Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see Ofcom's General Privacy Statement.

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Not applicable

3.1

Your response

Question	Your response
Question 1: How, and to what extent, are persons carrying out independent research into online safety related issues currently able to obtain information from providers of regulated services to inform their research?	Confidential? N The ability of independent researchers to obtain information from digital platforms regarding online safety matters is potentially constrained by substantial barriers. [The experience of Linterna Verde, a Colombian organization studying digital public debate, provides a compelling case study that illustrates these limitations in practice](#). Meta's data library, while representing one of the most promising tools available to researchers, exemplifies the complex challenges faced when attempting to access platform data. Based on Linterna Verde's documented experience, obtaining access requires navigating a demanding multi-step process that creates significant barriers to entry. The approval process demands researchers present well-defined projects while meeting stringent qualification requirements. As Laura Palacio from Linterna Verde notes, Meta's evaluation focuses heavily on the research leader's profile, requiring an extensive background in data management and analytical tools, which can exclude qualified researchers who lack specific technical expertise. As observed in Linterna Verde's case, the access mechanism itself imposes notable operational constraints. For instance, authorization is restricted to specific individual Facebook profiles, which complicates collaborative research efforts. In this vein, adding new researchers to a project requires submitting separate approval requests, creating unnecessary administrative burdens. The organization's experience indicates that a more efficient approach would allow research institutions to manage access internally while maintaining appropriate security protocols. Technical requirements typically present additional hurdles: researchers must take specialized courses and meet various technical specifications. Linterna Verde's application process extended between six to eight weeks, including an initial rejection and subsequent adjustments. Even after gaining access, researchers face significant limitations in data utility: the library restricts access to comments and commenter identities, lacks direct links to often force researchers to rely on manual searches, making the research process "difficult and tedious", as Palacio mentioned. There are, additionally, economic aspects that present significant barriers. As highlighted by Linterna Verde's leadership, platforms must manage extensive server infrastructure requiring substantial resources. The associated costs, combined with platforms'

Question	Your response
	perceived lack of benefit from providing unrestricted access, create additional obstacles to comprehensive research access.

Furthermore, the challenge of data interoperability between platforms hampers research capabilities. Namely, the inability to effectively combine and compare data across different services limits researchers' capacity to conduct comprehensive analyses of online safety issues. This limitation is particularly problematic when investigating cross-platform phenomena or attempting to understand broader patterns in online behaviour.

As highlighted by Linterna Verde's experience, the current landscape of platform data access demonstrates that even when formal access mechanisms exist, they remain prohibitively complex and restricted. This situation particularly affects organizations from regions with limited resources, creating an imbalance in research capabilities and understanding of online safety issues. |
| **Question 1a:** What kinds of online safety research does the current level of access to information enable?

    ● What type of independent researchers are carrying out research into online safety matters?
    ● What topics/issues they are researching? | Confidential? – N

As per Section 162(2) of the OSA, a person carries out independent research when they do so "on behalf of a person other than a provider of a regulated service".

Any guidance OFCOM produces in this matter must keep the definition of "independent research" as broad as possible.

Not all research on the risks posed by the design and operation of platforms is conducted by academics. A significant portion of it is carried out by think tanks, non-governmental organizations (NGOs), and civil society at large. Civil Society Organizations (CSOs) are often deeply engaged with the practicalities of regulatory implementation and involved in day-to-day dialogues with different (state and non-state) stakeholders. They frequently possess specialized expertise in specific issues—sometimes surpassing that of the regulators themselves. As a result, CSOs can bring an innovative perspective to research, posing practice-oriented research questions pointing at addressing the most pressing needs of the DSA implementation.

Moreover, research on online safety is also done by think tanks, independent policy experts, trust and safety service providers, international organizations, and state actors.

Any guidance OFCOM produces that facilitates data access for researchers ought not to subject access to data to the condition that the research carried out in connection with a specific topic/range of topics (see, for instance, article 40 of the Digital Services Act that explicitly states that researcher's access to data is limited to research). More research on the economic, social, |

Question	Your response
	organizational, and other aspects of platforms' functioning and utilization will contribute to a better understanding of the financial and regulatory incentives they respond to, the societal dynamics that drive their users' behavior, and the main threats to the enjoyment of human rights online.
Question 1b: Are there types of information that independent researchers are currently unable to access that may be relevant to the study of online safety matters? If so, what are they and what kind of research would they facilitate?	Confidential? – N

The lack of standardization and transparency in accessing digital platform data presents a significant challenge for researchers, particularly in the field of online safety. These challenges manifest across multiple dimensions that collectively impede comprehensive research efforts.

A fundamental obstacle lies in the fragmented nature of data ecosystems across platforms. Each platform maintains its own distinct data architecture, severely limiting researchers' ability to conduct comparative analyses across different services. [As highlighted by Carlos Cortés, director of Linterna Verde](#), platforms show limited interest in providing unrestricted data access, citing the substantial economic and resource costs associated with server management.

The precarious nature of existing data access tools further compounds these challenges. Recent developments with tools such as CrowdTangle and Twitter's API illustrate this vulnerability. Meta has significantly restricted access to CrowdTangle, reducing its utility for researchers, while Twitter's introduction of API access fees has created additional barriers, particularly affecting researchers working with limited resources.

Even when platforms offer dedicated research facilities, such as Meta's data library, researchers face complex and demanding access procedures. These processes require researchers to present robust project proposals, demonstrate expertise in data management and analytical tools, complete specific training courses, and meet technical requirements. Furthermore, even after gaining approval, researchers encounter limitations in data updates and scope, which constrain their ability to conduct timely and comprehensive research.

Researchers from the Global South face additional challenges due to resource constraints, inadequate infrastructure, and limited funding. This disparity creates a significant research gap that hampers accurate comparative studies and the identification of trends between the Global North and South.

To address these challenges, several key interventions are necessary. The establishment of clear regulatory frameworks |

Question	Your response
	defining platform data access conditions is crucial for ensuring transparency and enabling rigorous independent research. The definition of "researcher" should be expanded to acknowledge the valuable research conducted by civil society organisations and journalists, granting them equal access to data alongside academic researchers.
	Promoting North-South collaboration is essential for addressing regional disparities. This could include facilitating joint research proposals and providing support mechanisms to help Global South researchers overcome resource barriers. Furthermore, fostering open dialogue between platforms, researchers, regulators, and civil society is crucial for addressing concerns about data protection, user privacy, and research ethics.
	The standardization of available platform data should encompass both quantitative and qualitative data types, enabling deeper, contextualised understanding of online phenomena. Equitable access to digital platform data is fundamental for independent research and digital accountability. Achieving this requires coordinated effort to overcome existing barriers and build a more transparent, inclusive, and responsible research ecosystem.
Question 1c: What data governance models are currently used to allow access to online services' information for researchers? ● This might include: open-access forms of information-sharing, such as publicly-accessible information libraries or databases; information-sharing models that rely on vetting or accreditation of individuals or organisations; and/or models that rely on the accreditation of the specific use cases for the information. ● Please provide relevant examples of these governance models used in the online services industry.	Confidential? – Y / N
Question 1d: What technologies are typically used by providers of online	Confidential? – Y / N

Question	Your response
services to facilitate existing information access?	
Question 1e: Have services and/or researchers made use of privacy-enhancing technologies to enable access?	Confidential? – Y / N

Question	Your response
Question 2: What are the challenges that currently constrain the sharing of information for research into online safety related issues?	Confidential? – Y / N
Question 2a: What are the legal challenges/risks to sharing information from online services with independent researchers?	Confidential? – N The main challenge remains the privacy of the users whose information is shared.
Question 2b: What are the technical challenges relating to sharing information from online services with independent researchers? What are the challenges relating to the scale and complexity of the information involved?	Confidential? – N The information shared need not be large or complex. Researchers will have ahead of them the tasks of assessing the information needed for their research projects and tailoring their information requests to those needs, so they do not get more information than they are able to process or handle. In such a case, they should have the chance to refine or amend their request. Meaningful research extends beyond easily quantifiable metrics, and researchers investigating nuanced or complex social dynamics must be equally empowered to contribute to our understanding of digital platforms. To effectively assess risks to online safety, a more profound and contextualized understanding is imperative. Critical research questions such as "How do users perceive platforms' content moderation policies and how do these policies impact their online behavior?" demand a robust qualitative research approach. To comprehensively evaluate platform governance, researchers must move beyond numerical aggregations and engage in in-depth analytical methodologies. For instance, a purely quantitative study focusing solely on the number of posts removed for "disinformation" would be

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	insufficient to determine the fairness, accuracy, or consistency of moderation decisions. Conversely, qualitative analysis enables a comprehensive assessment of whether platform policies are inappropriately censoring legitimate content. Access to data such as the posts' content, user interactions, comments, and content moderation strategies would let researchers analyze online discourse, identify behavioral patterns, understand user perceptions, and—ultimately—evaluate platform policies' real-world implications.

It could be the case that the data required by researchers is in fact large and complex. In such a case, it would be useful to take into account that the realities faced by researchers worldwide are diverse and complex. If the conditions to access data are set to a high bar, they would impose significant challenges for researchers in the Global South, adding another layer of barriers to data access for those who already face more significant difficulties in researching digital platforms. It is essential to consider that an underlying factor that differentiates researchers from the Global North and the Global South is their access to infrastructure and funding, fundamental parts of data collection and processing.

In this regard, we recommend that the conditions established for researchers to access the data take into account the resource scarcity faced by researchers outside of the Global North. Therefore, the possibility of north-south and south-south collaboration between researchers would be key for Global South researchers to achieve impactful research. The delegated regulation issued by OFCOM should explicitly include provisions accepting joint applications by teams of researchers affiliated with different institutions, even based in different countries. |
| **Question 2c:** What are the security challenges relating to sharing information from online services with independent researchers?

● What are the security challenges relating to the potential sensitivity of information?
● What are the security protocols required to protect information from misuse?
● To what extent do you view security as a governance issue | Confidential? – Y / N |

Question	Your response
compared to a technical infrastructure issue?	8
Question 2d: What are the information quality challenges relating to online services sharing information with independent researchers?	Confidential? – Y / N
Question 2e: What are the financial costs to online services relating to online services sharing information with independent researchers?	Confidential? – Y / N
Question 2f: What are the financial costs to researcher trying to make use of information shared by online services?	Confidential? – Y / N

Question	Your response
Question 3: How might greater access to information for the purpose of research into online safety issues be achieved?	Confidential? – Y / N
Question 3a: What models, arrangements or frameworks exist for allowing researchers access to sensitive information beyond the online services industry? What are the benefits and risks of those models, and how might they apply to the online services context?	Confidential? – Y / N
Question 3b: Are there any models or arrangements that exist in the online services industry already that might provide increased access to information for research purposes if applied more generally across the industry? If so, what are these and what are the	Confidential? – N Models like APIs for researchers, apps like former Crowdtangle, ad repositories and content libraries can be useful resources for researchers. However, the challenges reported in question 1b remain and demonstrate the need for further regulation in the area.

Question	Your response
benefits and disadvantages of these models/arrangements?	
Question 3c: What are some possible models for providing researchers with access to relevant information that may not exist or be widely used yet, but which might be implemented by industry?	Confidential? – N [Drawing from European Center for Nuclear Research's (CERN) experience](#), the establishment of a sort of Information Environment Research Initiative (IERI) could serve as a cornerstone initiative for providing researchers with access to relevant information and other research resources. This multinational, interdisciplinary research center would focus on studying the information environment and its impact on democracy. The Institute would provide cutting-edge data engineering and analysis tools. Through international collaboration, it would facilitate knowledge exchange and research network development while offering comprehensive training programs for researchers, policymakers, and CSOs. The Institute's sustainability would be ensured through a diversified funding model combining government support, private sector contributions, and philanthropic partnerships. Complementing this institutional framework, Data Cooperatives could be developed where technology companies would share anonymized data with accredited researchers under regulatory supervision. These cooperatives would implement standardized protocols for data collection, processing, and sharing, ensuring interoperability and comparability across platforms while maintaining robust privacy safeguards through anonymization and strict access controls. To facilitate practical research applications, Data Sandboxes could be established as controlled environments where researchers can work with real platform data under stringent security and privacy protocols. These environments would enable scenario simulation and risk assessment of new technologies — thus providing valuable insights for policy development and intervention strategies. Additionally, the establishment of Dedicated Research Funds would be crucial for supporting independent Internet governance research, with particular attention to Global South researchers' needs. These funds would provide infrastructure grants and research fellowships, enabling broader participation in international research initiatives and fostering global collaboration. Essential to these models' success would be the implementation of robust transparency and accountability mechanisms, ensuring public oversight and civil society participation. Notwithstanding its benefits, such oversight mechanisms should not hinder the research process. For instance, the implementation of independent ethics committees, while useful for evaluating research proposals

Question	Your response
	to protect user rights, might simultaneously impose excessive bureaucratic burdens on smaller organizations and/or independent researchers.
Question 3d: What are the advantages and disadvantages of this approach? ● These may include elements pertaining to financial, legal, security, technical or feasibility issues	Confidential? – Y / N
Question 3e: What role could third party organisations, such as regulatory bodies, civil society or public sector organisations have in facilitating researcher access to online safety information?	Confidential? – N When examining barriers to information sharing for research purposes, the volatility of civil society funding represents a significant constraint, particularly in Latin America and the broader Global South (for further discussion, see Internetlab's interview with Agustina Del Campo, CELE's Director). This challenge manifests in several interconnected ways that fundamentally affect research quality and sustainability. CSOs in these regions often rely heavily on external funding sources, which substantially influence their research focus areas. When funder priorities shift, CSOs may be compelled to redirect their research efforts, even when certain topics remain critically relevant. This dependency creates significant obstacles for long-term research initiatives and consistent knowledge generation about online services, ultimately limiting these organizations' ability to provide regulators with comprehensive evidence. The absence of stable funding streams significantly affects research infrastructure within Latin American CSOs. This limitation manifests in reduced capacity to meet technical requirements for handling sensitive data, insufficient resources for maintaining adequate security protocols, and limited ability to participate in data-sharing arrangements. These infrastructure constraints create substantial barriers to participating in research activities that require robust technical capabilities and security measures. Furthermore, the resource disparity between Global North and South research institutions creates a significant research gap. This disparity particularly affects Latin American researchers' participation in global platform regulation debates and the representation of Global South perspectives in international policy discussions. The resulting imbalance means that critical regional perspectives and experiences are often underrepresented in global discussions about platform regulation.

Question	Your response
	To address these challenges effectively, it is essential to develop sustainable funding mechanisms specifically targeted at Global South research institutions while creating equitable frameworks for international research collaboration. Additionally, establishing infrastructure support programmes would enable compliance with data-sharing requirements. These measures would contribute to more effective approaches to online safety challenges while ensuring diverse global perspectives inform regulatory frameworks. The development of more sustainable and equitable funding models for Global South research is crucial for addressing online safety challenges effectively and ensuring truly global perspectives in regulatory approaches.
Question 3f: What could these third-party models look like, and what are some of the benefits and challenges associated with this approach?	Confidential? – Y / N
Question 3g: What categories of information should online service providers give researchers access for the study of online safety matters? Why would this information be valuable for the study of online safety matters?	Confidential? – N Any regulation issued on mandatory data access should include a set of categories of information that companies must share with researchers, but should not be limited to those. As a general rule, companies should share with researchers all the information they have or can easily produce, absent trade secrets or user privacy reasons. A dispute settlement mechanism should be set up to resolve controversies arising from denied requests. The categories of information should be crafted to enable different kinds of research besides those quantitative-oriented dealing with big quantities of data. Qualitative data is as important and this should be reflected in the categories of information proposed.