13 June 2023

Re: Data access in the Online Safety Bill

CC: Parliamentary Under Secretary of State Paul Scully MP, Lord
Parkinson, Number 10 Policy Unit, The Lord Grade of Yarmouth CBE,
Dame Melanie Dawes DCB,

Dear Secretary of State,

With discussion in the House of Lords on the Online Safety Bill, we wanted to write to you
about social media platform data access for accredited researchers and civil society
organisations.

Currently, the Online Safety Bill states that the regulator OFCOM must produce a report
within two years, describing how, and to what extent, people carrying out independent
research into online safety matters would be able to obtain data from providers of regulated
services to inform their research. We believe these requirements can be strengthened now
instead of waiting for a subsequent report. This would potentially bring forward the timeline
for researcher access to data in line with the developments that have occurred with the EU's
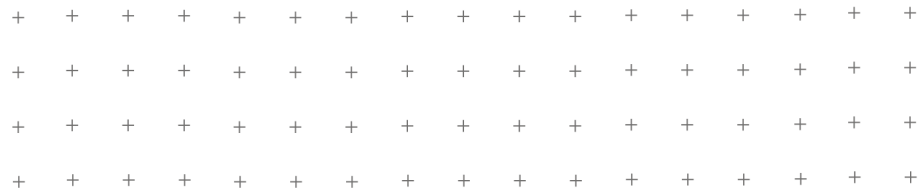Digital Services Act.

**We strongly urge the Government to support the amendments proposed by Lord
Bethell, Lord Clement-Jones and Lord Knight of Weymouth for 'Access to information
by approved independent researchers' and a 'Code of practice on access to data by
researchers'.**

These amendments would **accelerate** and **increase** the **data access** provision in the Bill
and have already received support from over 25 organisations, including academics,
charities and online safety campaigners.[1]

We believe that such amendments are necessary for **independent research, democratic
oversight** and **accountability**. As researchers, we are calling for support for these
provisions.

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[1] https://www.reset.tech/documents/Civil_Society_Briefing_OSB_Data_Access.pdf

Firstly, data access helps keep people safe online.

The UK is fast becoming one of the top places in the world for research on online harms. With these provisions, the UK can have more skilled people able to assess the safety of online platforms. Without such access, regulators are asking platform companies, in effect, to mark their own homework or to lean on taxpayers to pay for hiring more skilled people to help do this analysis. The provision of social media platform data is a key regulatory level for the Online Safety Bill. OFCOM has the expertise to make such provisions so that they respect people's privacy and companies' intellectual property. This is also in line with the recent advisory by the US surgeon general Dr. Vivek Murthy calling on policy makers to 'ensure technology companies share data relevant to the health impact of their platforms with independent researchers and the public in a manner that is timely, sufficiently detailed, and protects privacy' as a critical step for youth mental health.[2]

Secondly, data access can ensure the UK remains one of the most innovative places for research in the world.

The Government recently launched the AI White Paper, with the aim of driving responsible innovation and maintaining public trust in this revolutionary technology.[3] Data access is imperative to achieving these goals. The newly launched Department for Science, Innovation and Technology has a mission to drive innovation.[4] The proposed data access provisions help to ensure that computational social science researchers stay in the UK, rather than leave for projects in the EU which already has these data access provisions in place. Strengthening the provisions in the Online Safety Bill would prevent a 'brain-drain' of talent leaving our shores for the EU.

Finally, the UK has the opportunity to jumpstart online safety work, by learning from the early experiences in other jurisdictions.

There is currently a Code of Conduct for how platform companies could share data with researchers under General Data Protection Regulation (GDPR).[5] These principles have been agreed by the research community and most platform companies, who are in the process of signing the Code. If the proposed amendments are adopted, OFCOM could model a UK Code of Practice on the hard work and long negotiations with platform companies that have already taken place through the European Digital Media Observatory and elsewhere.
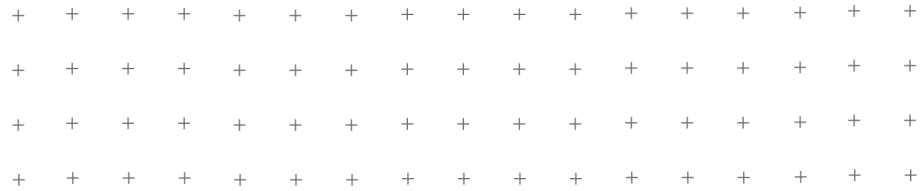
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[2] https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf, p 15.
[3] https://www.gov.uk/government/news/uk-unveils-world-leading-approach-to-innovation-in-first-artificial-intelligence-white-paper-to-turbocharge-growth
[4] https://www.gov.uk/government/organisations/department-for-science-innovation-and-technology
[5] https://edmo.eu/2022/05/31/edmo-releases-report-on-researcher-access-to-platform-data/#
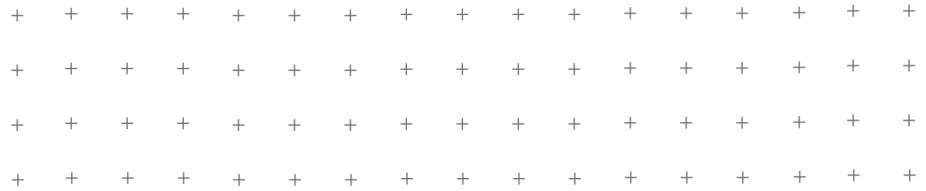
We urge you to support these amendments, and ensure researchers, along with journalists, policymakers and civil society, can effectively understand some of the most pressing issues facing our societies today.

We are copying this letter to the Parliamentary Under Secretary of State Paul Scully MP, Lord Parkinson, Number 10 Policy Unit, The Lord Grade of Yarmouth CBE, and Dame Melanie Dawes DCB.

Yours sincerely,

Name	Organisation
Prof. Gina Neff	Minderoo Centre for Technology and Democracy, University of Cambridge
Prof. Sir David King	Climate Crisis Advisory Group
Prof. Sonia Livingstone	Department of Media and Communications, London School of Economics and Political Science
Prof. Frank Kelly	Faculty of Mathematics, University of Cambridge
Prof. Derek McAuley	Horizon Digital Economy Research, University of Nottingham
Dr Amy Orben	MRC Cognition and Brain Sciences Unit, University of Cambridge
Prof. Kate Dommett	Department of Politics and International Relations, University of Sheffield
Reema Patel	Research Director, Ipsos and Associate Fellow, Leverhulme Centre for the Future of Intelligence
Prof. Cristian Vaccari	Department of Communication and Media, Loughborough University
Dr Dan Richards	Imagination Lancaster and Data Science Institute, Lancaster University
Prof. Angela Aristidou	University College London, School of Management and Stanford University CASBS
Prof. Jack Stilgoe	Department of Science and Technology Studies, University College London

Dr Jonathan Corpus Ong	Department of Communication, University of Massachusetts at Amherst, USA
Prof. Nathaniel Persily	Stanford Law School
Prof. Helen Kennedy	Department of Sociological Studies, University of Sheffield
Dr Anya Skatova	Bristol Medical School, University of Bristol
Professor Clare McGlynn	Durham Law School, Durham University
Professor Philip N. Howard	Oxford Internet Institute, University of Oxford
Professor Alan D. Jagolinzer	University of Cambridge, Judge Business School, and Centre for Financial Reporting & Accountability
Professor Sander van der Linden	Department of Psychology, University of Cambridge