DATASPHERE INITIATIVE

GSF GLOBAL SANDBOXES FORUM

Insights Session Report

SANDBOX ASSESSMENT FRAMEWORK #1

Thursday, July 24, 2025

ABOUT THE DATASPHERE INITIATIVE

The Datasphere Initiative is a think and do tank that catalyzes meaningful dialogues and co-creates actionable and innovative approaches to respond to data challenges and harness opportunities across borders. Our mission is to equip organizations to responsibly unlock the value of data for all. For more information, visit www.thedatasphere.org or contact info@thedatasphere.org.

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EXECUTIVE SUMMARY

On 24 July 2025, the Datasphere Initiative hosted an Insights Session of the Global Sandboxes Forum (GSF). The session brought together sandbox experts, researchers, and institutional partners for a focused strategic dialogue on advancing sandbox methodologies as instruments for responsive and inclusive data governance.

The webinar introduced and explored the Sandbox Assessment Framework (SAF) being developed by the Datasphere Initiative, a practical and modular tool created to help teams assess the readiness, progress, and impact of sandboxes. Designed to support all stages of the sandbox lifecycle, from inception to evaluating outcomes, the framework aims to harmonize practices, improve design, and achieve greater results.

The SAF is being developed in response to the rapid but uneven growth of sandbox initiatives worldwide. Recognizing that there is no one-size-fits-all model, the SAF serves as a structured starting point for evaluating sandbox initiatives across three critical stages: pre-implementation readiness, ongoing progress monitoring, and post-implementation impact assessment. The GSF session discussions focused on the pre-implementation stage, which is designed to support an initial self-assessment, helping implementers evaluate whether the challenge they seek to address is appropriate for this tool and whether the minimum conditions are in place to design and execute a sandbox effectively. In doing so, the SAF aims to streamline setup and operations, reduce trial-and-error, and promote equity and innovation.

The webinar was organized into **three main parts**. Lead discussants shared insights and experiences from implementing sandboxes in their respective jurisdictions, while participants engaged through structured polls, questions, and comments.

HIGHLIGHTS FROM THE SESSION

The central theme of the webinar was the Sandbox Assessment Framework (SAF), which Sophie Tomlison - Director of Programs Datasphere Initiative, introduced as a practical tool to support those considering or already implementing sandbox initiatives.

Lorrayne Porciuncula, the Executive Director at Datasphere Initiative, expanded on the rationale for developing such a framework. Sandboxes, she observed, come in many shapes and forms, "like Marvel characters," as she put it, each with its own strengths, weaknesses, and contexts.

While this diversity is a strength, it also creates confusion, making it difficult to compare initiatives or identify lessons across cases. The SAF is being designed to address this challenge by identifying common building blocks and minimum conditions that should be considered in any sandbox design.

The framework is organized into three stages: initiation, which looks at the rationale and readiness to embark on a sandbox; implementation, which focuses on process, governance, and stakeholder engagement; and evaluation, which seeks to capture lessons and assess impact.

This GSF Insights Session was dedicated to the early phase of sandbox development, sandbox initiation, and structured around three foundational axes of the SAF:

WHAT and WHY
Clarifying the purpose and strategic value of a sandbox.

WHO
Identifying and engaging stakeholders.

HOW
Planning for resources, processes, and safeguards.

PART 1

WHAT AND WHY – Purpose of Sandboxes

- **Moderator: Bertrand de La Chapelle, Chief Vision Officer, Datasphere Initiative**
- **Discussants:**
  - Alany Reyes Pichardo, Sr. Supervisor AI - Autoriteit Persoonsgegevens (Dutch DPA)
  - Prof. Antonino Rotolo, Coordinator of "EU Regulatory Sandboxes for AI" (EUSAiR)
  - Ahmad Rizal Azwir, NTIS Lead - National Technology and Innovation Sandbox (NTIS)

The discussants set the tone by bringing together perspectives from Europe and Asia. Bertrand described the sandbox as a "collaborative laboratory of trust," emphasizing its role as a tool for experimental regulation and multi-stakeholder engagement that goes beyond mere compliance. He stressed that the early stage of any sandbox is critical, as success depends on a clear, shared understanding of the problem being addressed and the purpose of the initiative.

Alany Reyes Pichardo framed regulatory sandboxes as critical mechanisms to build trust between innovation and compliance. She discussed the requirement for Member States to establish AI regulatory sandboxes by 2026 under the EU AI Act, and the Dutch DPA authority's piloted approach. The pilot underscored the importance of inter-agency collaboration, since no single authority holds all the expertise, and early stakeholder engagement, which surfaced practical questions that shaped the sandbox's design. The resulting sandbox model was multi-sectoral, with a tiered response system: simple queries from solution providers participating in the sandbox were handled quickly, sector-specific issues were referred to relevant regulators, and complex cases were addressed through longer sandbox trajectories. This flexible structure reduced regulatory uncertainty while generating valuable learning. A key lesson was that the quality of submitted questions determined the usefulness of guidance. To strengthen this, the authority introduced templates to help participants frame issues clearly. Even simple questions, when explored in context, often revealed deeper systemic challenges that enriched collective understanding.

> *"The complexity of the regulatory landscape should not be a hindrance or obstacle to submit a question or to innovate. That's why we are going to think of the responsibility to answer even the simple questions, because even those can help us understand the system and help those organizations in a fast way."*

Read more about the Autoriteit Persoonsgegevens (Dutch DPA) AI sandbox here.

Prof. Antonino Rotolo explained the aims of the EUSAiR project, which focuses on understanding and promoting regulatory sandboxes across Europe. He argued that sandboxes are equally critical for fostering innovation and advancing regulatory learning. This learning benefits not only providers, who gain clarity on how to navigate compliance, but also regulators, who must grapple with how the EU's AI Act interacts with existing laws across diverse sectors. He underscored the relevance of these sandboxes in facilitating legal experimentation and regulatory learning. His approach involves mapping the landscape of AI-related regulatory sandboxes, developing shared methodologies, and promoting stakeholder dialogue to ensure ethical and accountable AI development.

> *"...this leads to how you want to develop the sandbox right?.....you can run different types of testing. You can just work on a conversational approach, you can also rely on technology, and digital infrastructure testing. So the purpose you assigned to the sandbox leads to different models you may have of the development of regulatory sandboxes."*

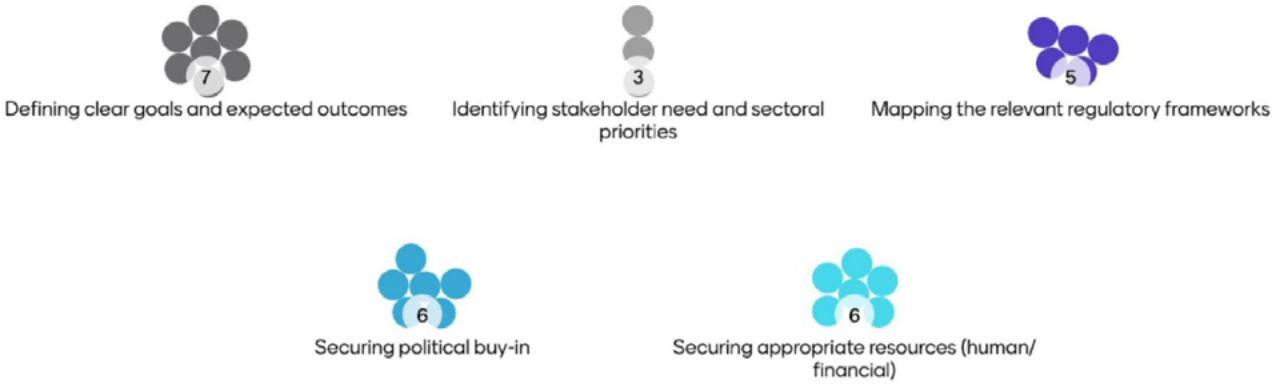
Read more about the EUSAiR project here.

Ahmad Rizal Azwir provided a concrete, practice-based perspective from Malaysia's National Technology and Innovation Sandbox (NTIS). He described how the national sandbox initiative reduces risk for innovators by bringing public and private stakeholders together early in the innovation cycle. By aligning incentives and providing regulatory certainty, the NTIS fosters a trusted environment for testing novel technologies. He noted that real progress has been enabled by ministerial openness to temporarily relax regulations, allowing innovators to pilot without waiting for full legislative reform, an approach that builds confidence for public and private players to co-invest, co-deploy, and adopt local solutions. Over time, NTIS has become more than a testing environment: it now serves as a policy instrument that strengthens local innovation and positions Malaysia as a hub for global collaboration.

> *"Our problem statements set the tone for everything that follows that, including our stakeholder alignment to the success of the solution provider's commercialization journey. When we work together with our partners, we want to understand the problem statement ... because what we learned is that if it's too broad, then the sandbox can become diluted. If it's too narrow you're going to lose your scalability."*

Read more about Malayasia's National Technology and Innovation Sandbox (NTIS) here.

Poll: Which element of the early sandbox design phase do you find most challenging?



Results

The poll results reveal key challenges faced during the early sandbox design phase. The most commonly selected difficulty was **defining clear goals and expected outcomes**. This was followed by challenges related to **securing political buy-in** and **securing appropriate resources (human/financial)**. Fewer participants found **mapping the relevant regulatory frameworks** or **identifying stakeholder needs and sectoral priorities** to be the primary obstacles.

PART 2

WHO – Stakeholder Engagement and Support

- **Moderator:** Morine Amutorine, Africa Sandboxes Forum Lead, Datasphere Initiative
- **Discussants:**
  - Keith Sabilika, Senior Specialist in Financial Technology at the Financial Sector Conduct Authority (FSCA), South Africa
  - Dr. Abigail Gilbert, Co-Director - Institute for the Future of Work
  - Nasubo Ongoma, Research Consultant - Qhala

The session on the "who" of sandbox design centered on the critical role of stakeholders in the initial phases of sandbox development. Additionally, the discussion highlighted some of the critical structural challenges that go beyond human factors.

Keith Sabilika emphasized the role of regulatory sandboxes as practical learning environments for both regulators and innovators. His emphasis on framing the sandbox's value proposition to secure buy-in rightly highlights the importance of strategic communication and aligning stakeholder incentives. Speaking from the Financial Sector Conduct Authority's (FSCA) experience in launching and running the Intergovernmental Fintech Working Group (IFWG) Regulatory Sandbox in South Africa, he described how sandboxes enable real-time observation of market dynamics and foster the development of evidence-based, adaptive policy. Rather than focusing solely on compliance, he stressed the value of the sandbox in building regulatory understanding and transparency. Additionally, he noted that sandboxes demonstrate the ability to foster collaboration across multiple stakeholders while nurturing continuous learning, an especially critical factor in fintech, where cross-cutting technologies demand shared knowledge and joint problem solving.

"One of the biggest challenges and most critical success factors has been to demonstrate the tangible benefits of running a sandbox, the return on investment of this sandbox to top management. Some of the strategies that we have to utilize center around having a clear articulation of why the sandbox exists and what specific problems we are trying to solve.

Now, it's all about framing this value proposition in ways that resonates with the various stakeholders that you'll be engaging with. For instance, for our top management, our commissioners, we have emphasized the strategic imperative of a sandbox as a tool that we can use to respond to transformational innovation in the financial sector and expedite regulatory understanding of the potential risks and benefits of innovative financial products. It also provides a strong foundation for regulators to amend policies because we'll be coming from a data driven environment."

Read more about the IFWG Regulatory sandbox here.

Dr. Abigail Gilbert brought a systems perspective, exploring how sandboxes could embed considerations of labor, fairness, and social impact. She advocated for a broader understanding of "stakeholders" that includes workers as communities potentially affected by the technologies being tested. Her perspective focused on the multidisciplinary skills needed to design, implement, and manage effective sandbox environments, stressing the importance of communication and framing the sandbox offer in ways that resonate with various stakeholders. This is particularly significant in the IFOW Sandbox, being hosted by an independent research and development institute:

> *"Communication skills have been particularly central and working out what the best narratives would be to attract and maintain relationships with the different types of stakeholders that needed to be involved... getting that framing right required ongoing thought and skill, and doing this was largely responsible for the long time between project conception and inception. We knew the methodologies that we were going to be using and the use cases we wanted to look at, and that's perhaps a reflection of the fact that internally we were already thinking about how to develop those frameworks as researchers, but finding a way to position the offer and the problem required much more from us."*

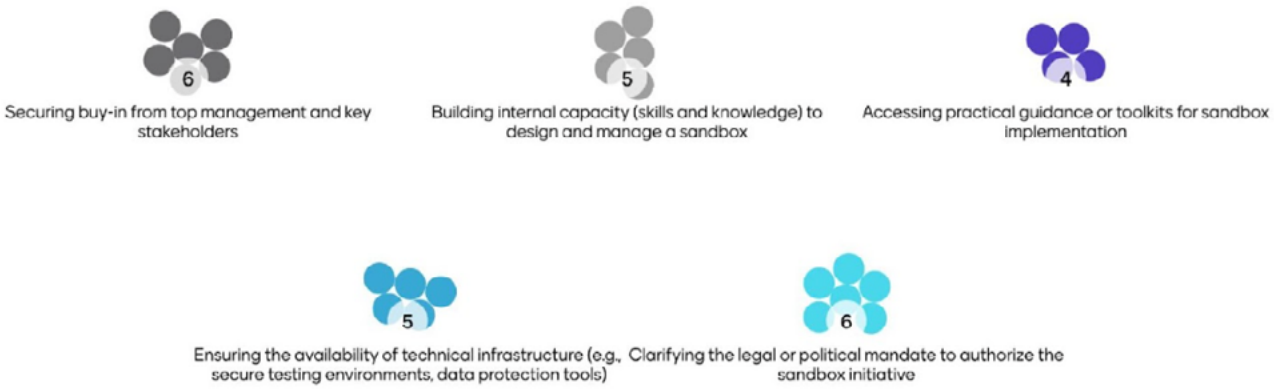
Read more about IFOW's ResponsibleAI sandbox here.

Nasubo Ongoma brought forward the perspective of startups navigating Kenya's complex innovation ecosystem, describing the development of the Digital Trade and Regulatory Sandbox, designed in partnership with the African Continental Free Trade Area (AfCFTA) Secretariat. She underscored the need for sandboxes to streamline regulatory engagement and reduce friction for emerging companies. Her insights focused on making sandbox processes more accessible and intuitive, especially for early-stage innovators who often operate with limited resources and institutional support. The Digital Trade and Regulatory Sandbox focuses on two use cases, local smartphone manufacturing and AI for health, and addresses barriers such as taxes, duties, and inconsistent product standards that hinder innovators from scaling across countries. To tackle these challenges, Qhala convenes working groups of regulators, innovators, lawyers, and supply chain actors to map mismatched laws, share data, and build consensus. By presenting evidence of what works in different jurisdictions, the sandbox secures stakeholder buy-in and promotes regulatory harmonization.

> *"We are looking at the data and we are bringing in the different stakeholders together to try and look at some of the challenges they are facing. For example, in AI for health work, where we are looking at how to localize large language models for primary health care. We started with Kenya, looking at how LLMs are being used, and how we can bring in the different benchmarks. Having this data and sharing it with the different stakeholders, will allow us to have buy-in, because we realize that unless regulators are really understanding the problems that innovators are facing, then it will be difficult to bring the two people together."*

Read more about Qhala's Digital Trade and Regulatory sandbox here.

Poll: What aspect of stakeholder engagement in a sandbox is most challenging for you?



Results

The poll results shed light on the most pressing challenges participants face when engaging stakeholders in sandbox initiatives. The two most frequently cited difficulties were **securing buy-in from top management and key stakeholders** and **clarifying the legal or political mandate to authorize the sandbox**. Close behind were challenges in **building internal capacity** and **ensuring the availability of technical infrastructure**, both identified by 18%. Meanwhile, **accessing practical guidance or toolkits for sandbox implementation** was noted by 14% of participants.

PART 3

HOW – Resources, Processes, and Safeguards

- **Moderators: Lorrayne Porciuncula (Executive Director, Datasphere Initiative)**
- **Discussants:**
  - Eliza Lemos, Senior Legal Advisor, Attorney General's Office of Brazil (AGU - Advocacia-Geral da União União)
  - Jonathan Middleton, Director, Financial Services - NayaOne
  - Lee Chein Inn, Deputy Director, Development of Data Driven Tech - IMDA Singapore
  - David Benhamou, Legal Advisor - Luxemburg National Commission for Data Protection (CNPD)

This session took a pragmatic turn, grounding the conversation in logistics, tools, and metrics.

Eliza Lemos spoke about Brazil's evolving sandbox ecosystem, emphasizing the importance of adaptable legal frameworks within public institutions. She highlighted Brazil's experience in creating a regulatory sandbox reference guide, stressing that sandboxing is not only a legal or political decision but also an operational challenge requiring adequate human resources, infrastructure, governance structures, and safeguards to protect trust and rights. She underscored the need for self-assessment, cost planning, clear decision-making structures, and risk management. Eliza also highlighted how principles-based design, inter-agency coordination, and legal literacy efforts are helping integrate innovation-friendly methodologies into traditional governance models.

> *"...running a sandbox is not just a legal or political decision. It's an operational one. Because yes, you need a political and a legal framework to support the efforts, but you also need resources and coordination in this situation to make the project actually work."*
>
> *"Before launching anything, we encourage public institutions to begin with some questions, such as: Do we have the human resources to monitor the experiment? Are our IT systems and legal teams prepared to handle the sandbox? Do we know the kind of data, infrastructure and safeguards we will need? This self-assessment is crucial to avoid frustration and reputational risk."*

Read more about Brazil's Sandbox Guide here.

Jonathan Middleton focused on the infrastructure of effective sandbox environments. Drawing on NayaOne's experience, he stressed that sandboxes must replicate real-world conditions using data, APIs, and cloud infrastructure to help innovators move from concept to a compliant product. Speaking on operational sandboxes, he stated they function as digital platforms that combine access to data (often synthetic or public), technology resources (including developer environments and AI compute), and collaborative activities like tech sprints. He explained that these platforms serve both mature companies ready for regulatory dialogue and early-stage innovators still shaping their models. He highlighted two operational models: an "always open" model, where innovators can access resources with minimal regulator involvement, and challenge-based cohorts, focused on specific issues like digital assets or AI. Jonathan emphasized that this approach accelerates product development, increases investment potential, and allows regulators to track emerging trends early, while filtering different companies to the right level of support without overwhelming staff.

> *"I think the interesting thing about operational sandboxes is that they enable the regulator to think about those mature companies who are ready to have a conversation with regulators about the solution being market ready.*
>
> *By providing resources, they also help enable 90% of companies that are earlier on in the pipeline, that are growing their ideas before they get to that final stage. And what that enables is that the regulators are able to understand at a much earlier stage what some of these emerging business models are, and what some of the technology approaches are, and how that might impact from a policy perspective, a regulatory approach."*

Read more about NayaOne Digital Sandbox solution here.

Lee Chein Inn outlined Singapore's national approach, describing how the IMDA embeds sandboxes within broader data governance strategies. She noted that each sandbox must be purpose-built, kept light and agile, and provide value for all stakeholders. She emphasized iteration and adaptability, with safeguards tailored to the sandbox's purpose. She emphasized their utility not just for policy testing but for cross-sectoral coordination and long-term innovation ecosystem development, positioning sandboxes as levers for agile, future-proof governance.

> *"...each sandbox has to be purposefully built. Because a sandbox is just a tool. You can have many, but you can't have a tool that does everything. So it has to be purposefully built, don't try to do everything using one sandbox."*

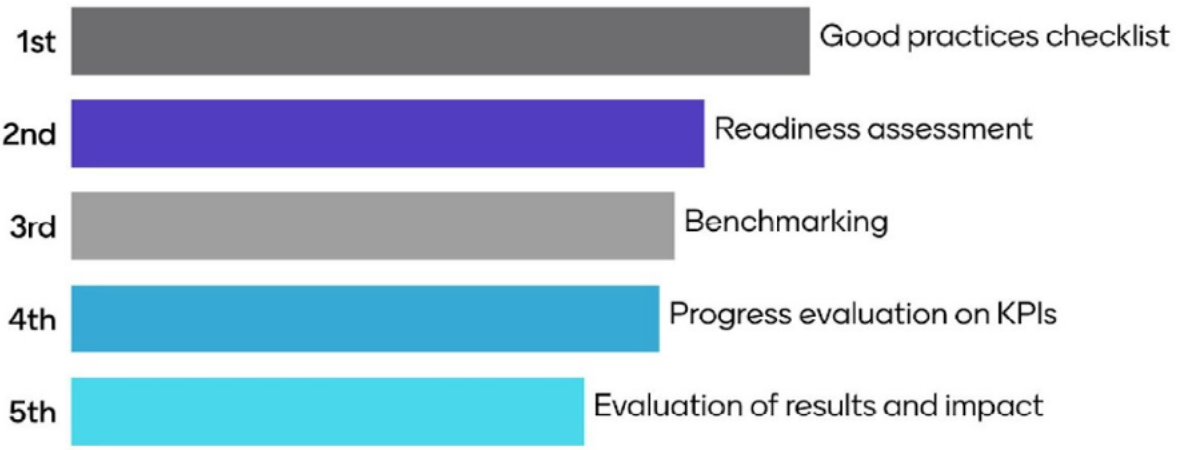
Read more about IMDA PETs sandbox here.

David Benhamou addressed the importance of trust and transparency in regulatory experimentation. Representing Luxembourg's CNPD, he explained how early-stage engagement and proportional safeguards can enable AI innovation while maintaining strong public confidence in data protection. He stressed the value of a "learning by doing" approach and outlined key risks: the misconception that sandboxes imply regulatory leniency, the potential impact on fundamental rights, market distortion, and regulatory fragmentation across jurisdictions. Proposed mitigation measures included early clarity with participants, continuous oversight with suspension powers, transparent dissemination of outcomes to reduce unfair advantage, and alignment with common EU frameworks to ensure consistency. He underlined the role a sandbox assessment framework could play as a shared reference point to harmonize practices and build trust across contexts.

> *"One of the primary risks we foresee is a misunderstanding that participation in the sandbox might offer a form of regulatory leniency, and that's not the case at all. The sandbox is not a deregulated space. It's a supervised environment. And so it means that obligations laid out in the act fully apply in the sandbox setting."*

Read more about the CNDP AI Regulatory sandbox here.

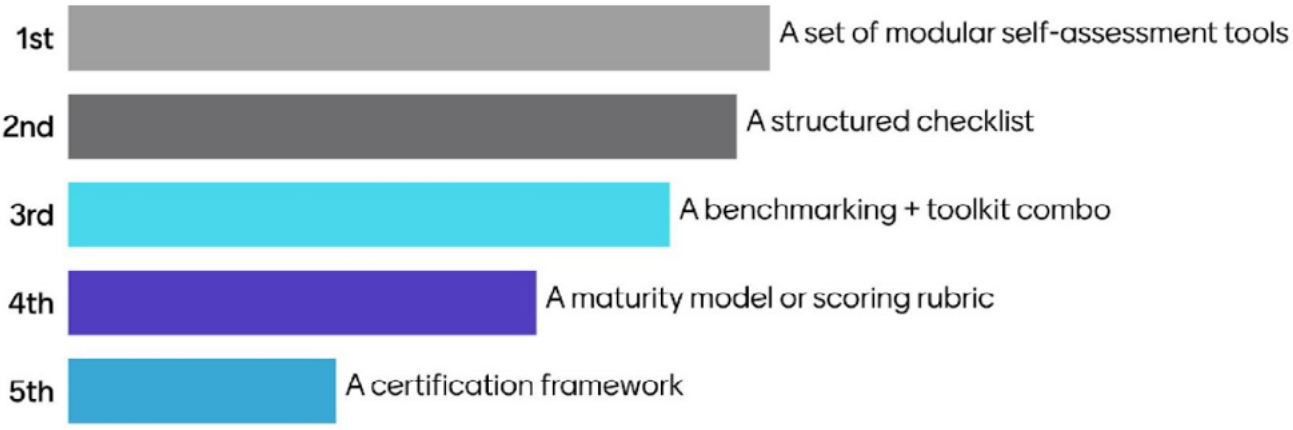
Poll: What role should a Sandbox Assessment Framework play in sandboxing?



Results

Participants expressed strong support for a **multi-functional role** of the Sandbox Assessment Framework. Leading was the idea of a **good practices checklist**, seen as a practical guide for ensuring that sandbox design and implementation remain grounded in proven methods. Close behind were **readiness assessments and benchmarking**, reflecting the need for tools that can gauge preparedness and compare performance across different contexts. Participants also considered the importance of **progress evaluation through KPIs** and **evaluating results and impact**, underlining that a framework should not only guide setup but also track outcomes and long-term effectiveness. Overall, the poll suggested that the SAF should serve as both a **practical guide** and a **measurement tool**, balancing implementation support with accountability.

Poll: What is the best format for making the SAF usable across diverse contexts?



Results

When asked about the most suitable format for a Sandbox Assessment Framework, participants leaned toward flexibility. The top choice was a **set of modular self-assessment tools**, highlighting the need for adaptability. **A structured checklist** and a **benchmarking + toolkit combo** followed closely, pointing to demand for clear step-by-step guidance that also enables comparison and shared learning. Fewer participants preferred more rigid formats such as **maturity models** or **scoring rubrics**, and the **certification framework** drew the least support, suggesting that participants value practical, adaptable formats over formal compliance models.

CONCLUSION REFLECTIONS

In wrapping up the session, several participants offered forward-looking reflections. **Jai Ganesh** (Executive Director of AeHIN), noted the richness and intensity of the discussions, suggesting a concise digest of insights, resources, and shared links would help participants absorb and revisit the content. He additionally echoed the value of regional surveys, especially in the health sector. **Jonathan Middleton** highlighted the UK energy regulator's new consultation on an AI sandbox, pointing to the growing spread of sandboxing beyond financial services into sectors like energy, transport, and logistics. **Sissi De La Peña** (Director & Founder of The DoT Network) reinforced this trend, noting how sandboxes are increasingly embedded in legislation, with adoption expanding from finance into telecoms and other technology sectors, making knowledge-sharing across communities ever more valuable.

Lorrayne Porciuncula concluded the session with a thoughtful reflection, weaving together both the polling results and the collective energy of the discussion. She noted that the feedback offered a diagnostic snapshot of what sandbox practitioners and policymakers truly need today. She emphasized that the Datasphere Initiative will take these insights seriously as it continues to evolve the Sandbox Assessment Framework and accompanying tools.

Importantly, she reminded participants that the GSF community is not simply a circle of observers but a network of co-creators.

> *"This is a community of practice with real-world needs and high expectations. Our job now is to meet you where you are, with insights, scaffolding, and shared resources that matter in the field."*

The session closed on a high note, with renewed energy, commitments to follow up, and enthusiasm for future initiatives, including surveys, podcasts, and other community-driven projects. Lorrayne underscored the critical role of champions in spreading awareness and advancing sandbox culture, and the importance of spaces like this to identify allies, exchange resources, and seed collaboration. These insights will serve as a foundational guide for how the Datasphere Initiative prioritizes its support to this growing network of sandbox innovators, advisors, and decision-makers.

ANNEX 1: SHARED TOOLS AND REFERENCES

The following materials were provided to support sandbox development:

Africa Sandboxes Outlook Report

Sandbox Co-Creation Lab Reports - Abuja & Kigali

Sandbox Introduction Guide

Datasphere Governance Atlas 2025

Global Sandboxes Forum portal

Dutch Sandbox Architecture

Brazil's Sandbox Guide, a joint effort of AGU and MDIC

The Call for Abstracts for HealthAI Global Governance Forum 2025

The IFOW sandbox

White Paper on Regulatory Sandboxes - Cybersecurity National Lab - CINI

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