

# Administrative transparency versus opaque surveillance policies

Systematic use of freedom of information requests as a data collection method

Nicolas Bocquet

Emmanuelle de Buisseret Hardy

Corentin Debailleul

Jérémy Grosman

Laurent Roy

*Translated from French into English by Nicolas Bocquet*

**To cite:** Bocquet, N., Hardy, E. de B., Debailleul, C., Grosman, J., & Roy, L. (2025). Administrative transparency versus opaque surveillance policies: Systematic use of freedom of information requests as a data collection method. *Réseaux*, 251(3), p. 179–218, <https://doi.org/10.3917/res.251.0179>

## **Abstract**

Surveillance technologies have become ubiquitous, yet they are still shrouded in secrecy. This article assesses the relevance of the systematic use of freedom of information requests as a data collection method, to document the evolution of the surveillance infrastructure in French-speaking Belgium. It discusses the internal factors (specific to the research team) and external factors (specific to the authorities approached) likely to influence the level of administrative transparency. Our results reveal significant differences depending on the type of administrative entity, the relevant legal standards, and the political colour and size of the municipality. They also suggest that this method may prove relevant as a complement to case studies on surveillance, provided that substantial human resources are available. This article thus contributes to the debate on the use of freedom of information requests as an original data collection method for social sciences research purposes, particularly in the context of public policy sectors where the culture of secrecy is relatively widespread.

**Keywords:** freedom of information requests, police, video surveillance, administrative transparency, sousveillance, French-speaking Belgium.

## **LA TRANSPARENCE ADMINISTRATIVE CONTRE L'OPACITE DES POLITIQUES DE SURVEILLANCE**

### **Le recours systématique au droit d'accès aux documents administratifs comme méthode de collecte de données**

#### **Résumé**

Devenues omniprésentes, les technologies de surveillance n'en demeurent pas moins marquées par le sceau du secret. Le présent article évalue la pertinence du recours systématique au droit d'accès comme méthode de collecte de données, afin de documenter l'évolution de l'infrastructure de surveillance en Belgique francophone. L'article discute des facteurs internes (propre à l'équipe de recherche) et externes (propres aux autorités sollicitées) susceptibles d'influencer le niveau de transparence administrative. Nos résultats révèlent des différences significatives selon le type d'entité administrative, les normes légales en la matière, la couleur politique des communes ou leur taille. Ils suggèrent également que cette méthode peut s'avérer pertinente pour compléter les études de cas sur la surveillance, à condition que les moyens humains à disposition soient conséquents. Cet article contribue ainsi à la réflexion sur le recours au droit d'accès comme méthode originale de collecte de données à des fins de recherche en sciences sociales, en particulier dans le contexte de secteurs de l'action publique où la culture du secret est relativement prégnante.

**Mots-clés :** demande d'accès aux documents administratifs ; police ; vidéosurveillance ; transparence administrative ; sousveillance ; Belgique francophone.

Inquiries focusing on public institutions characterized by secrecy inevitably face major obstacles in collecting data<sup>1,2</sup>. However, the right of access to administrative documents enshrines what is known in most liberal democracies as the ‘transparency’ or ‘openness’ of the administration, allowing anyone to demand that an administrative body produce a document in its possession (Berne, 2023). Journalists and activists have long used freedom of information (FOI) requests to circumvent the opacity of administrative bodies (Pozen & Schudson, 2018). Researchers use this method on a more ad hoc basis to obtain information that would otherwise be inaccessible (Savage & Hyde, 2014; Dowling, 2015; Bruce, 2016; Walby & Luscombe, 2019). The originality of our approach lies in systematizing the use of FOI requests to build a public policy sector database: that of surveillance policies. In the following pages, we attempt to assess, from a methodological perspective, the relevance of the systematic use of FOI requests as data collection method in social sciences.

This article originates in the project – initiated by researchers, associative workers and political activists – to document the evolution of the acquisition of surveillance equipment by the French-speaking Belgian authorities between 2000 and 2022. The number of surveillance devices (cameras, drones, body cams, etc.) acquired by the Belgian authorities for various policy purposes (public safety, road management, public cleanliness) has increased steadily in recent years, driven in particular by regional and federal investments and ‘smart’ city projects (Bocquet, 2021; Debailleul, 2021). However, the proliferation and development of these technical devices poses a major challenge from the point of view of fundamental rights and freedoms: by increasing the asymmetry of power between the governors and the governed, such devices seem likely to limit the possibilities of disobedience or resistance that are essential for maintaining the democratic equilibrium (Celikates, 2013; Bocquet, 2025; Bocquet & Knops, 2025).

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1 We would like to thank the anonymous reviewers, as well as the coordinators of the call, for the quality of their feedback; the members of the *Technopolice Belgium* collective and of the LDH’s “new technologies and privacy” commission; the editorial teams of the daily *Le Soir* and the weekly *Le Vif* the members of Tactic and LQDN who agreed to share their experiences with us; the *Domaine Public* association, which graciously hosts our database; and finally Louise Knops and Sarah De Laet for their helpful feedback. Although the research project at the origin of this article did not benefit from any specific funding, some of the data collected have been analyzed since January 1, 2025, thanks to the financial support of the Fonds de la Recherche Scientifique – FNRS under Grant no. PDR T.0257.25.

2 Authors’ names are listed in alphabetical order. Nicolas, Corentin and Jérémy wrote most of the article together; Emmanuelle and Laurent contributed to the draft version; Emmanuelle, Corentin and Jérémy have been managing FOI requests since 2022; Nicolas participated in their design; Laurent joined them in 2023 and coded the responses; Emmanuelle wrote and introduced the appeals.

The present contribution is of an essentially methodological nature, namely an assessment of the relevance of systematic recourse to FOI requests as a data collection method, and of some of the conditions for its possible success. In a nutshell: the right of access to administrative documents guarantees citizens the possibility of consulting administrative documents and obtaining a copy essentially free of charge. In Belgium, this right is enshrined in Article 32 of the Constitution and the laws and decrees that translate it at the various levels of the state (Renders, 2008; Terwangne, 2014; Michiels, 2014). In this paper, we propose to assess the relevance of this method in terms of three scientific virtues: (i) the completeness of the data it allows to be collected; (ii) the accuracy of the data actually collected; and (iii) the significance of the data collected for other scientific or political studies (Kitcher, 2001). We argue that the systematic use of FOI requests, while requiring interdisciplinarity and perseverance, does indeed make it possible to collect a quantity of quality data that would have been difficult to obtain using other data collection methods.

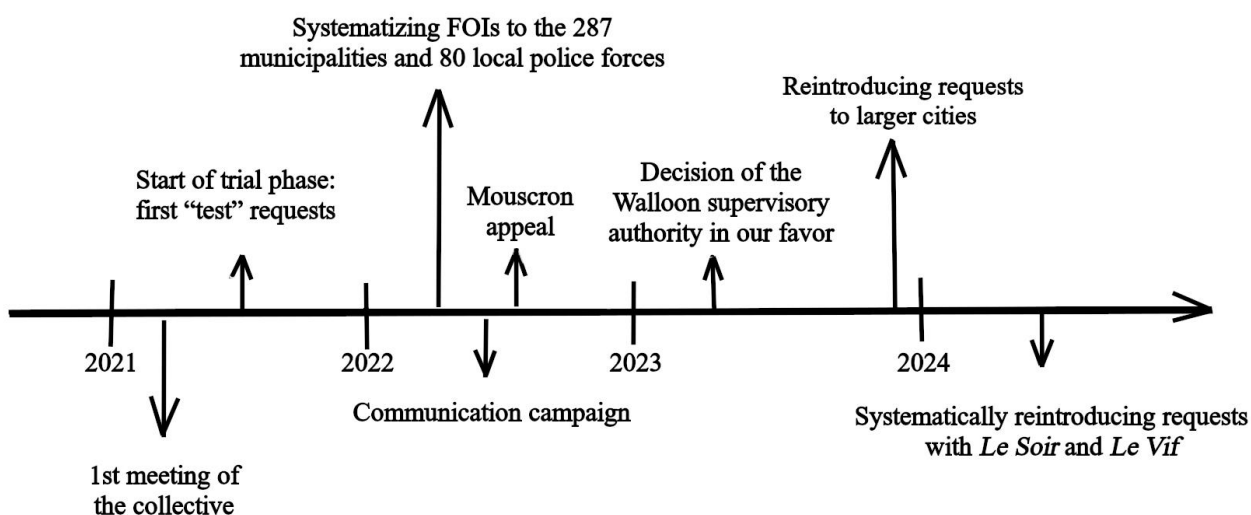
Our research is grounded in two principal bodies of literature. Firstly, the literature on administrative transparency, which examines the manner in which administrations respond to FOI requests and identifies specific factors influencing the effectiveness of the right of access. These include the gender of the sender (Cicatiello *et al.*, 2024), the political color of the administration (Cuillier & Pinkleton, 2011), or the tone used in the request (Worthy *et al.*, 2017). However, this literature pays little attention to the documents collected, focusing instead on the evaluation of transparency policies. In contrast, the literature on policing and surveillance frequently employs FOI requests to circumvent the culture of secrecy characteristic of regalian sectors of public action (Dowling, 2015; Bruce, 2016; Walby & Luscombe, 2019). While this second body of literature has produced some interesting methodological considerations (*e.g.* the fact that FOI requests often make it possible to obtain valuable data for social sciences, when the documents requested are not intended to be made public – see Savage & Hyde, 2014, Walby & Luscombe, 2017), it does not discuss any systematic recourse to FOI requests for data collection purposes. This article, to the best of our knowledge, presents the first discussion of an approach that seeks to systematize FOI requests as a data collection method for documenting a public policy sector.

The structure of our article is as follows. The first section discusses the methodological decisions that were taken during the data collection process, reflecting on the main internal factors, specific to our research team, likely to influence the level of administrative transparency of the entities approached. These factors include the documents requested, the selection of recipients, the choice of

sending association, the legal form adopted, and the digital platform utilized. The second section addresses external factors, namely those specific to the authorities solicited, which appear to influence their level of administrative transparency. These factors include the existence of a legal obligation, the political color of the administration, the administration’s capacity to respond to FOI requests, and the administrative culture. The third and last section examines in more detail the relevance of our method, encompassing the completeness and quality, as well as the scientific and political significance of the data collected.

## The slow data collection: on methodological choices relating to our FOI requests

Figure 1 – Data collection chronology



This section details the main methodological choices that were made during the data collection process. In the spring of 2022, we filed FOI requests to some 350 municipalities and local police forces in French-speaking Belgium via *Transparencia*, an associative digital platform designed to facilitate the right of access. The FOI requests concerned four kinds of document: (i) the location of open-street cameras, (ii) municipal authorizations issued, (iii) documents relating to public contracts and (iv) data protection impact assessments (DPIA)<sup>3</sup> (see the full request in the appendix). This

<sup>3</sup> Under the GDPR, a controller must carry out a DPIA when the processing presents “a high risk to the freedoms and rights of data subjects” *cf.* Data Protection Authority, “Data Protection Impact Assessment” (available online at <https://www.autoriteprotectiondonnees.be/professionnel/rgpd/>)

collection was conducted as part of the *Technopolice* campaign<sup>4</sup>, an initiative to critically document surveillance infrastructures that was launched in 2019 in France by the civil liberties association *La Quadrature du Net* (Tréguer, 2024). We present the main decisions taken in formulating FOI requests as well as in introducing a strategic appeal, in dialogue with the literature on the right of access. The aim is to contribute to a pragmatic reflection on the conditions for successful data collection based on FOI requests.

## Formulating and filing FOI requests

The initial challenge was to formulate the FOI requests to be sent to the authorities, establishing the intended recipients, the documents requested, the official sender and the form of the request.

With regard to documents, we drew on the findings of our previous research (De Keersmaecker & Debailleul, 2016; Bocquet, 2020, 2021) and our knowledge of the field, in order to identify the desired documents and the administrations in possession of them. The administrative and legal expertise of certain members of the research team facilitated the identification of documents that were likely to prevent the invocation of exceptions relative to the non-possession of documents, the secrecy of information, or the abusive nature of the request<sup>5</sup>. It is noteworthy that FOI requests discussed in social science literature predominantly concern a limited number of documents whose accessibility and publicity are not subject to debate (Cicatiello *et al.*, 2024).

With regard to the recipients, we decided to file FOI requests to all 287 local authorities and 83 local police forces. The municipalities and police forces are the primary entities responsible for the procurement of surveillance equipment<sup>6</sup>. During

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[analyse-d-impact-relative-a-la-protection-des-donnees](#)) [accessed January 16, 2025].

4 See Technopolice France, "Faire une demande CADA" (available at <https://technopolice.fr/cada/>) [accessed January 16, 2025].

5 More specifically, Belgian law provides for the existence of most of the documents requested from the administrations we contacted: communal authorizations, DPIA, public contracts – the camera list is the only document whose existence is not, as such, provided for by law. It should be noted that we requested DPIA precisely in order to be able to document their potential non-existence.

6 Belgium is a federal state with 581 municipalities and three regions: mostly French-speaking Wallonia and Brussels, and Dutch-speaking Flanders. The police are structured on two levels: the federal police and 183 local police forces. While the latter are responsible for all basic police tasks, both judicial and administrative, the federal police provide them with various forms of support – including operational. Historically, surveillance cameras tended to be installed at the initiative of local authorities, but today it is the police forces that are generally responsible for managing them. However, with the exception of mobile cameras (drones and bodycams), the use of public-access

the trial phase, other government departments were also contacted, particularly the Ministry of the Interior, which maintains a register of all cameras filming public spaces in the country. However, this proved to be unsuccessful. The selection of recipients was primarily guided by the existence of appeal procedures leading to binding decisions within a reasonable time frame<sup>7</sup>.

With regard to the sender, we chose to file our FOI requests on behalf of the Ligue des droits humains (a human rights watch organization in French-speaking Belgium, LDH hereafter). We thought that an institutional actor with a certain degree of democratic credibility, known for initiating legal proceedings (including against the state) and able to communicate publicly on these issues, would enable more information to be obtained from the authorities solicited. Esposito *et al.* (2024) indeed demonstrate, after systematically testing the 'sender effect' on administrative transparency, that the lowest response rate is obtained when requests are submitted by an anti-corruption activist association, rather than by citizens or university professors. Nevertheless, we believe that it is crucial to take into account the image of the association vis-à-vis the authorities contacted – besides, the non-response rates we get are much lower (see below).

With regard to the form of FOI requests, we decided to file written requests in a formal legal style, making explicit reference to legal texts concerning administrative transparency and surveillance devices, via the Transparencia digital platform<sup>8</sup>. The decision to use this platform was motivated by two considerations: i) from a practical perspective, the platform provides contact addresses for the relevant authorities, and its volunteers were willing to accompany us; ii) from a political perspective, using the platform enabled us to make public the documents sent by the authorities, as well as to make the platform visible so as to support a draft law, put forward by its volunteers, purporting to reform federal administrative transparency<sup>9</sup>. The decision to employ

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video surveillance systems by the police requires authorization from the local council. *Cf.* Law of August 5, 1992 on the police function.

7 Belgian law governing FOI requests depends on the level of power on which the administration depends: regional or federal – we will ignore the Community level here. Firstly, federal provisions provide for relatively slow appeal procedures that do not result in binding decisions, for example: the administration depending on the Ministry of the Interior. Secondly, regional provisions provide for relatively short appeal procedures leading to binding decisions, e.g. municipalities and single-municipality police forces. Finally, it should be noted that at the time of the survey, some administrations were not covered by any legal provisions governing FOI requests, e.g. multi-municipal police forces.

8 *Cf.* Transparencia, « Ligue des droits humains » (available online at [https://transparencia.be/user/ligue\\_des\\_droits\\_humains](https://transparencia.be/user/ligue_des_droits_humains)) [accessed January 16, 2025].

9 Law of April 11, 1994 on administration publicity.

formal and technical language, in accordance with the sender's choice and in contrast to the classic ethos of researchers, can be justified by the sensitive nature of the documents requested and the culture of secrecy that prevails within police institutions (Bracken-Roche, 2019)<sup>10</sup>.

It is important to note that the nature of FOI requests immediately establishes a 'confrontational' relationship with the administration contacted. One response, while expressing support for the principle of transparency, deplored "the barely veiled 'threat' regarding the follow-up in the event of a negative response to your request... The procedure is cavalier and questionable, to say the least"<sup>11</sup>. In order to circumvent the risk of self-exclusion from the field, Bracken-Roche (2019) recommends the prioritization of traditional data collection methods and the utilization of FOI requests as a final recourse. This approach is likely to be judicious for researchers seeking access to non-sensitive information (Van Meerbeek *et al.*, 2016). However, it may not be feasible for those, such as ourselves, who aspire to collect data from administrations maintaining a high level of secrecy.

## **Strategic appeal and refiling of FOI requests**

At the end of the formulation process in spring 2022, FOI requests were filed to all municipalities and police forces of French-speaking Belgium. Several months after the expiry of the legal deadline, dialogue was still ongoing with certain municipalities. But it progressively became apparent that, due to practical limitations, it would be unfeasible to ensure a rigorous follow-up of the responses from each individual municipality. The responses received were found to be both incomplete and heterogeneous. Moreover, a significant number of administrations refused to comply with our FOI requests, citing a relatively limited number of objections: the vague or abusive nature of our requests, business secrecy or imperatives of public order, as well as privacy, similarly to Mabillard *et al.* (2024). Consequently, it appeared that an administrative appeal would be likely to indicate (i) the public nature (or not) of the

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10 The scientific literature has sought to measure the specific effect of certain request formulations on response rates. For Belgium, Esposito *et al.* (2024) demonstrate that explicit reference to the legal framework increases or decreases response rates, depending on whether the requester is an ordinary citizen or a university professor. In addition to the impact of request formulation, studies also highlight other factors, such as geographical location. A notable example is the study by Cicatiello *et al.* (2024) in Italy, which demonstrates that response rates exhibit variation between the northern and southern regions of the country.

11 Response from a municipality of 5,000 inhabitants on Transparencia on August 14, 2024, our translation.

requested documents and (ii) the perseverance of the LDH regarding the requests submitted.

The main methodological issue was the selection of the administrative entity against which to initiate an administrative appeal. Following a thorough examination of numerous partial or complete refusals, we decided to pursue legal action against the municipality of Mouscron, for three main reasons. Firstly, we did not wish to initiate legal proceedings against a small municipality; Mouscron has a population of over 60,000. Secondly, we preferred to avoid initiating legal action against municipalities that had granted our requests, even partially; Mouscron did not provide any of the documents requested. Thirdly and lastly, we preferred to take legal action against a municipality that had provided reasons, even partial reasons, for its refusal to comply with our FOI request; Mouscron had sent us a letter giving administrative and legal reasons for their decision. In December 2022, the Walloon Commission for Access to Administrative Documents ruled on the case, confirming the full or partial publication of the documents we had requested<sup>12</sup>.

Three additional methodological comments can be made on the appeal procedure. First, without the support of the LDH, we would probably not have introduced appeals as researchers. The appeal procedures, even if they are intended to be accessible to citizens, present a number of practical obstacles, in particular the variety of procedures and the calculation of time limits for appeals – which led to the inadmissibility of three of our appeals before the Brussels appeal body<sup>13</sup>. Secondly, legal decisions do not have automatic effect: the municipality of Mouscron did not comply with the administrative decision before the LDH had sent it a formal notice – the documents were sent more than a year after the initial request. Thirdly, the existence of clear legal precedents does not prevent administrations from contesting the legitimacy of FOI requests. When, in 2023, we began to refile FOI requests to authorities on the basis of the favorable administrative decision, we regularly had to defend the scope of the decision. The relative success of the method seems to ultimately rest on the multidisciplinary and perseverance of our research team.

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12 More specifically, some of the documents requested had to be communicated entirely. This was the case for the list of cameras, including model, location and installation authorization. Other documents had to be disclosed at least in part: documents relating to contracts and DPIA – parts of which could be redacted if they were protected by business secrecy or security imperatives. Decision no. 257 of December 13, 2022 of the Walloon supervisory authority (available at <https://wallex.wallonie.be/contents/djas/1/1227.html>) [consulted on January 16, 2025].

13 On the basis of the LDH's statutes, the Brussels supervisory authority ruled that the person who lodged the appeals – i.e. the same person who had submitted the requests – did not have the authority to engage the association's legal responsibility.

We must also insist on what appears to be one of the most original dimensions of our methodological approach. On the one hand, the literature working systematically on administrative transparency generally takes little interest in the documents requested (Cicatiello *et al.*, 2024) and remains largely silent on the informal exchanges outside the deadlines which often make it possible to obtain some of the documents requested from the administrations. On the other hand, the literature mobilizing FOI requests for research purposes, while it regularly introduces administrative appeals, generally focuses on specific case studies (Walby & Luscombe, 2019). Our approach diverges from these literatures in at least two ways. Firstly, it presents one of the first attempts to systematically mobilize the right of access to administrative documents in order to build a database relating to a public policy sector. Secondly, it consists of a strategic appeal before an administrative body in order to set a legal precedent establishing the legitimacy of its approach.

## **Why are they not responding? On the external determinants of administrative transparency**

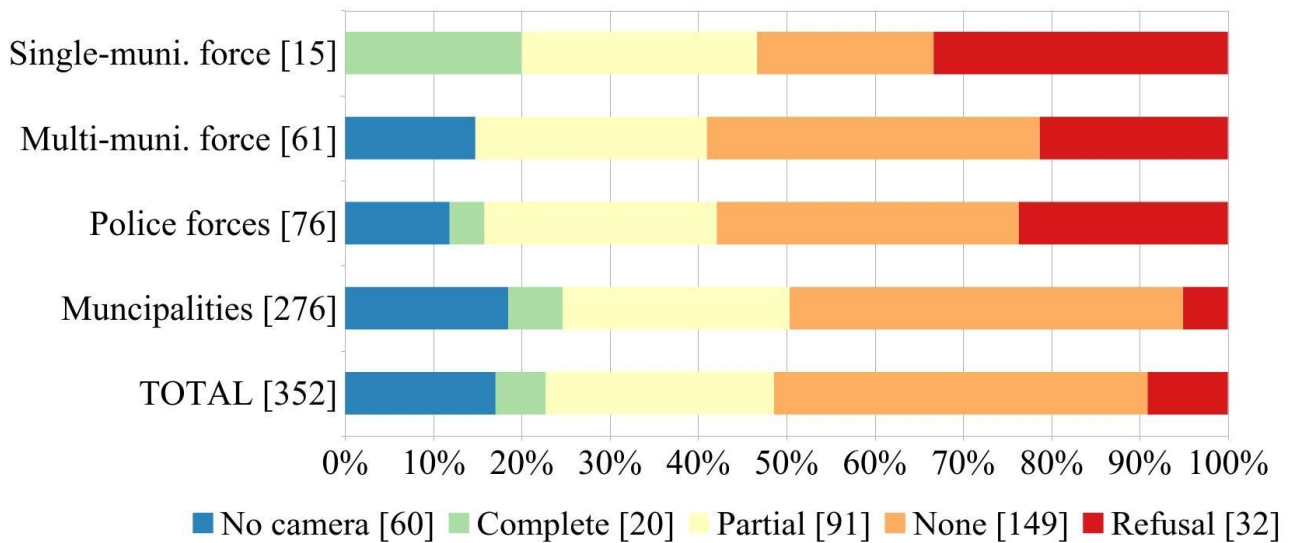
In the following paragraphs, the objective is to identify some of the external factors that are likely to influence the level of transparency of the administrations contacted. The results are compared with those obtained in two other FOI request campaigns launched independently in Belgium by journalists<sup>14</sup> and researchers (Esposito *et al.*, 2024; Mabillard *et al.*, 2024). We propose to cross tabulate certain characteristics of administrations with categories of responses to FOI requests introduced in 2022. The quality of the administrations' responses has been classified into five categories: "none" in the absence of a response, "refusal", "partial" if all documents were not provided, "complete" for exhaustive responses, and "no camera" when the request was found to be not applicable. We focus on four main characteristics likely to influence the attitude of the administrations contacted: (i) the existence of a legal obligation; (ii) the norms specific to the administrative culture; (iii) the position on transparency of the political party in power<sup>15</sup>; and (iv) the administration's capacity to absorb the workload associated with the FOI request.

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14 Denoël T. (2021), "Trois quarts des communes wallonnes ne sont pas transparentes, et la vôtre ?", Le Vif, Octobre 21 (available online at <https://www.levif.be/belgique/trois-quarts-des-communes-wallonnes-ne-sont-pas-transparentes-et-la-votre/>) [accessed January 16, 2025].

15 We also tried to measure the correlation between the response rate and the gender and age of the mayors. The results show that older and masculine mayors tend to provide fewer responses. However, the correlations are far from significant, so we can't draw any conclusions without further testing.

**Figure 2 – Quality of responses according to the type of entity contacted**



Source: our data

First, the responses appear to be influenced by the presence or absence of a legal obligation imposed on the administrative entities (see Figure 2). An analysis of the data confirms the plausibility of this hypothesis, as the response rate is higher for single-municipality police forces (47%) than for multi-municipality police forces (41%), the latter being the only administrative entities studied that were not subject to this type of legal obligation at the time of our inquiry. The conclusion, which may be considered obvious, is nevertheless important: the administrations would be, at least in part, receptive to FOI requests because of the legal obligations incumbent upon them (Wagner, 2021). Two additional remarks can be made. Firstly, our results demonstrate that a legal obligation is more effective than a constitutional obligation<sup>16</sup>. This suggests that the legal obligation is effective in that it organizes clear and rapid appeal procedures, which in turn leads the administration to consider condemnation as a probable outcome<sup>17</sup>. Secondly, the relative ineffectiveness of the legal obligation should be emphasized: around 50% of the entities concerned rejected our FOI requests or did not respond to them<sup>18</sup>.

16 There is a positive correlation (0.125) of low significance (p-value = 0.0661) between obtaining a response and the existence of a legal obligation with binding appeal decision.

17 The relative ignorance of administrations regarding the legal provisions on administrative transparency should not be overlooked: the publicity of documents requested, the nature of legal deadlines and the acceptable grounds for refusal – even if it is possible that, in some cases at least, this ignorance is in fact strategic.

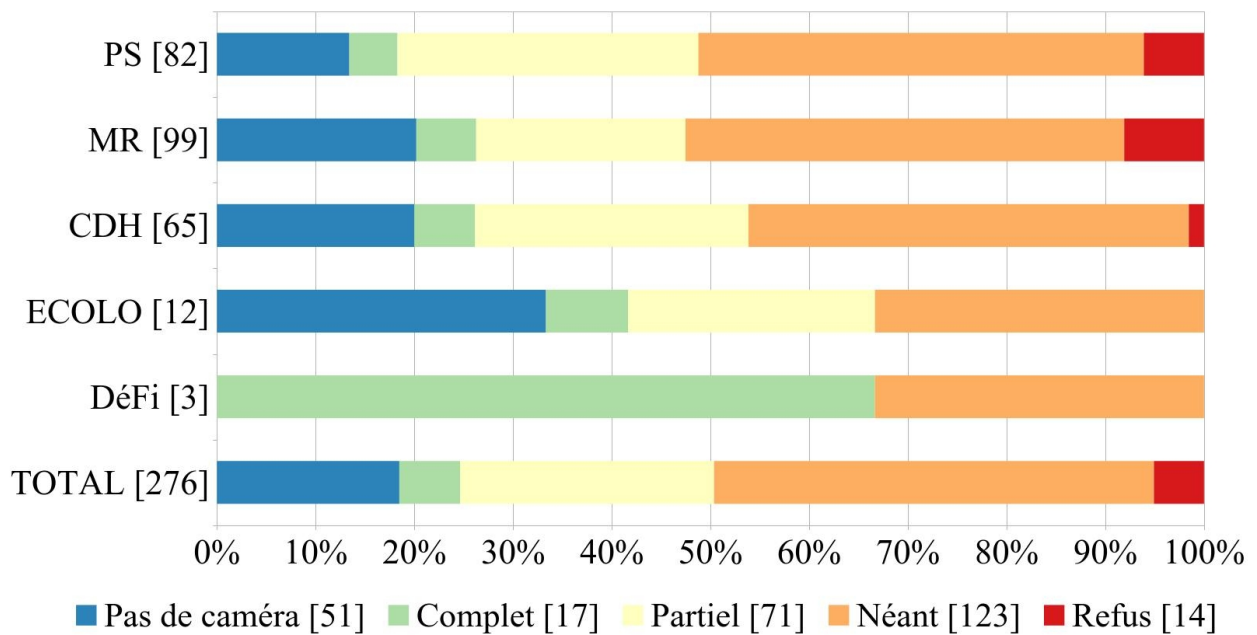
18 It should be noted that the non-response rate obtained for municipalities by journalists (Counasse or Denoël, Op. Cit.) and by Mabillard *et al.* (2024) is slightly lower (35%). We believe that this difference can be largely explained by the nature of the documents requested: draft communal

Second, the responses appear to be influenced by the relative importance of secrecy within the administrative cultures of the different kinds of entities (see Figure 2). Police forces demonstrated a higher propensity for refusal (24%) in comparison to local authorities (5%). Two explanatory hypotheses can be postulated: firstly, the surveillance mission constitutes a fundamental aspect of police activities, whereas it represents but one among multiple dimensions at the municipal level. Secondly, police administrations adopt a more assertive stance on secrecy compared to local authorities. The cultural differences between municipal and police administrations are posited as a plausible explanation for the observed discrepancy in their responses.

### **Figure 3 – Quality of responses according to the mayor’s political affiliation**

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deliberations. In other words, their requests concern a limited number of documents, not traditionally considered sensitive. For non-response rates in England (15%) and the Netherlands (35%), see respectively: Worthy *et al.* (2017), Grimmelikhuijsen *et al.* (2019).



Sources: our data and Dodeigne et al. (2020) for data on mayors' political affiliation

Third, the responses appear to be influenced by the attitude towards transparency displayed by the political forces running the administrative entity. The bills to strengthen the right of access submitted or voted on by Walloon and Brussels MPs in the federal and regional parliaments between 2019 and 2024 provide a clear indication of the positions adopted by the various parties<sup>19</sup>. These can be classified as follows: ecologists (Ecolo), centrists (CDH and DéFi), socialists (PS), and right-wingers (MR) – the ecologists having tabled bills making administrative decisions binding and the right-wingers never having supported any<sup>20</sup>. The statistical analysis of the responses – and the qualitative analysis of the exchanges – corroborate this hypothesis, as the municipalities governed by the ecologists (and to a lesser extent by the centrists or the socialists) demonstrate higher response rates (often of a superior quality) than those administered by the right-wingers<sup>21</sup> (see Figure 1). These outcomes are consistent with those of the investigation conducted by Belgian journalists<sup>22</sup>.

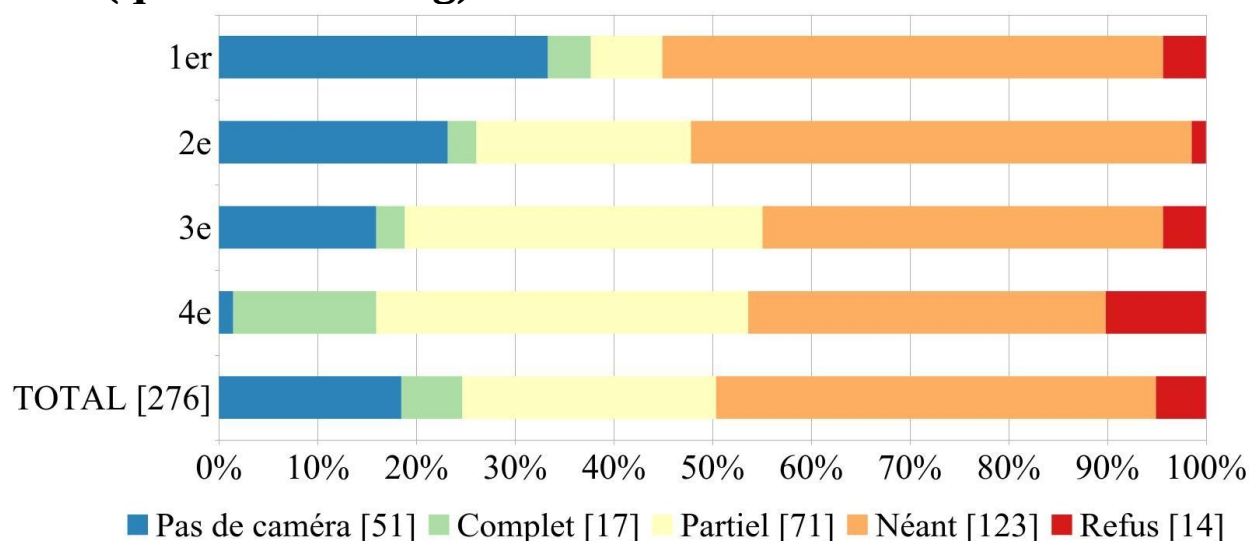
19 In 2019 and 2024, regional and federal bills, respectively, aim to strengthen the right of access to administrative documents – in particular by making the decisions of the supervisory authority on appeals binding. The centrist and ecologist parties are the only ones to defend the binding nature of appeal decisions at the various levels of power, while the socialist party defends it only at regional level. The right-wing party (MR) is the only one never supporting binding appeal decisions.

20 Cf. the journalistic surveys by Counasse (ibid) and Denoël (ibid).

21 MR-led municipalities provided us with 8% fewer responses than the average. Based on our aggregated data with that of Counasse (ibid) and Denoël (ibid), there appears to be a significant correlation (0.165) (p-value = 0.0223) between MR mayorates and refusal or absence of response. The ecologists manage too few municipalities to allow statistical tests.

22 Esposito and Mabillard informed us that they found no significant correlation for political parties (personal communication). We suggest the following explanation: Esposito and Mabillard's (2024) survey, unlike the journalists' survey, takes place well after the regional legislation has come into

**Figure 4 – Quality of responses according to local authority taxes (quartile ranking)**



Sources: our data and Dodeigne et al. (2020) for data on mayors' political affiliation

The final dimension we explore is the capacity of local authorities to absorb the workload associated with FOI requests (see Figure 4). Two main factors appear to influence the ease of response: the relative size of the authority and the presence of cameras within the municipality. Regarding the capacity of the administration, we measure it using the total tax base<sup>23</sup>, which is an indicator of the municipality's financial resources (Spáč et al., 2018; Mabillard et al., 2024). We consider here that the larger the tax base, the greater the human and technical resources available to the municipality to respond to FOI requests. The results tend to confirm this hypothesis: municipalities with fewer resources (1st and 2nd quartiles) actually provided us with very few partial (7%) or complete (4%) responses, while the better-off municipalities (3rd and 4th quartiles) responded much better (38% and 14%, respectively)<sup>24</sup>. Regarding the presence of cameras, municipalities with the smallest budgets are

force and, unlike our survey, concerns documents whose publication seems difficult for administrations to contest. The hypothesis would therefore be that the politicians in power would exercise their discretionary power all the more if they felt that they had room to maneuver. For studies demonstrating the importance of political color for administrative transparency, see Albalade et al. (2013); Tejedo-Romero & Araujo (2018); Spáč et al. (2018); Cuillier & Pinkleton (2011).

23 This is defined as "the sum of state taxes, municipal taxes and agglomeration taxes" (STATBEL, 2021).

24 The results reveal a positive (0.179) and significant (p-value = 0.0153) correlation between the presence of a response and total tax. However, studies on administrative transparency show that municipality size (which can act as a proxy) is not necessarily correlated with better response rates. English (Worthy et al., 2017), Dutch (Grimmelikhuijsen et al., 2019) and American (Cuillier & Pinkleton, 2011) studies measure no correlation between municipality size and response rate. Slovak (Spáč et al., 2018), Belgian (Esposito et al., 2024) and American (Ben Aaron et al., 2017) studies measure a positive correlation.

generally rural and small-scale, so it is not surprising that they were the most likely to declare our request not applicable (33%). In contrast, the highest refusal rates (10% compared with an average of 5%) were observed in the municipalities with the highest funding, which are likely to possess a substantial number of documents to provide and the necessary knowledge to invoke exceptions to administrative transparency.

In general terms, it would be easier for large municipalities to respond if they had the administrative capacity to absorb the workload (Spáč *et al.*, 2018; Esposito *et al.*, 2024). Here, a range of other complementary explanations can be imagined. For example, the plausibly increased media and electoral control for large municipalities would likely encourage them to respond. The predominant hypothesis suggests that administrations are more inclined to respond when it is easy for them to do so, with the administration's resources and the presence of surveillance systems being two factors, among others, influencing the ease of answering.

This section has examined the factors influencing the attitude of administrations towards identical FOI requests, the effectiveness of which remains limited. On the one hand, our results suggest that *administrations'* responses vary with (i) the existence of a transparency obligation and (ii) the administration's relationship to secrecy. These results complement existing literature on administrative transparency, which rarely varies the types of entities to which FOI requests are filed (for a few exceptions, see Cuillier & Pinkleton, 2011; Worthy *et al.*, 2017; Wagner, 2021). On the other hand, our results suggest that *municipalities'* responses depend on (iii) the position of the ruling political party regarding transparency and (iv) the capacity of its administration to absorb the workload associated with the request<sup>25</sup>. We thus add to the results of Esposito *et al.* (2024) and Mabillard *et al.* (2024) for French-speaking Belgium, by documenting the relationship between political color and response rate and by making the measure of "administrative ease" more complex.

## On the scientific and political relevance of the method

This section explores the relevance of systematically using the right of access to administrative documents as a data collection method, based on three scientific

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<sup>25</sup> Densely populated urban areas tend to vote left-wing, and since population size is a factor influencing response, we tested the interaction of these two factors: response rate is more strongly correlated with size (0.333) than with political color (-0.164 with MR); however, the trend with party attitudes is confirmed when we isolate the two factors by considering rural and urban areas separately. See the contingency table in the appendix.

virtues extracted from methodological contributions from social sciences (Tracy, 2010; Savage & Hyde 2014; Walby & Luscombe 2019) and the philosophy of science (Jardine 1986; Anderson, 1995; Kitcher, 2001). Completeness refers to the idea that a sociological investigation, insofar as it seeks to provide a credible account of a process or situation, must be careful not to neglect any source of data likely to importantly transform the way it looks at the objects under study. Accuracy refers to the idea that the data actually collected may contain a number of errors, whether due to deliberate or inadvertent miscommunication on the part of the informants, requiring comparison with data obtained by other means. Significance of the data refers to the idea that a scientific inquiry – in terms of the descriptions and explanations it puts forward – necessarily depends on its capacity to articulate with other scientific or political investigations. We believe that the systematic use of FOI requests demonstrates these three virtues to a certain extent.

## **From rigorous data collection to data credibility**

The responses to our FOI requests quickly confronted us with a large quantity of raw data (more than 5000 documents) in many different formats. The main difficulty, when aiming for completeness and homogeneity of the data collected, lies in assessing the quality of the answers provided by each administration. We cannot stress enough how difficult and important it is to follow up with the 350 or so administrations we contacted in an informal way (by email and phone) and a formal way (legal appeals and formal notices). We have therefore refiled FOI requests to the most populous municipalities, starting in 2023, and then to all municipalities, after being joined by journalists from the daily newspaper *Le Soir* and the weekly newspaper *Le Vif*, who had conducted studies on administrative transparency a few years earlier<sup>26</sup>. This renewed campaign has resulted in an increase in the response rate from 50% to 80% between 2022 and 2024. In the following paragraphs, we propose to reflect on the rigor of the collection process and the credibility of the data collected in 2022.

39 municipalities and 12 police forces sent us lists of camera locations, and the most complete of these include geographical coordinates, camera models, and names of data controllers. But most of them only provide (approximate) addresses. We must also emphasize the difficulty of assessing the accuracy of the camera lists received.

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<sup>26</sup> Cf. Counasse and Denoël (Op. Cit.). After initially contacting them in the context of writing this article with the aim of comparing our respective results, they immediately seized the opportunity to join us and take advantage of the proximity of the October 2024 municipal elections to put maximum political pressure on municipal administrations.

Although it is difficult to verify exact numbers and locations, it is nevertheless possible to verify the existence of public cameras by consulting (i) participatory mapping projects<sup>27</sup>, (ii) local press articles covering camera purchases, (iii) minutes of municipal councils and police boards. In this way, we were able to identify – and compare – a handful of municipalities that erroneously declared that they had no cameras.

With regard to public procurement documents, 44 municipalities and 9 police forces sent us at least one special specification. The most interesting public procurement documents are the specifications and award decisions; in rarer cases, we obtained information on the competing companies and the winning bid. Despite the relative standardization of these documents, the extensive variety of structures employed in public procurement underscores the necessity for the utilization of a relational database. In principle, it is possible to triangulate the information received by consulting (i) the bulletin of adjudications for large contracts, (ii) data from regional departments controlling public procurement, and (iii) the minutes of municipal and police councils. These checks haven't been done yet because they usually require new FOI requests.

Only 13 municipalities and 4 police forces sent us DPIA, and we received two main reasons for the implicit or explicit refusals. First, several administrations invoked the sensitive nature of DPIA to justify either their non-disclosure or their redacted disclosure. Second, we suspect that some administrations haven't carried out DPIA required by law. Two indications lead us to take this last possibility seriously. First, some municipalities told us they don't think they are subject to these legal obligations. Second, the metadata of some of DPIA we eventually received showed that the file was created after our FOI request was filed.

The case of the City of Liège enables to contrast the contributions of different data collection methods:

- In 2019, the City refused to share the locations of surveillance cameras for a geography dissertation (Grady, 2019).
- In 2022, our FOI request allowed us to immediately obtain the locations of the cameras, but Liège refused to send us the other documents requested.

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27 See for example Technopolice Belgium, "Map of social control" (available online at <https://carto.technopolice.be/>); Sous-surveillance, "sous-surveillance" (available online at <https://sous-surveillance.net>); Surveillance under Surveillance, "what", (available online at <https://sunders.uber.space>) [addresses accessed January 16, 2025].

– In 2023, the refiling of our FOI request, albeit based on the administrative appeal decision, failed to convince the City to send us the other documents.

– In 2024, an administrative appeal against the City of Liège finally led them to send us all the requested documents.

The 500 or so documents obtained in Liège provide valuable details about the processes involved in deploying surveillance systems, offering a unique insight into a complex administrative process (consultations with local stakeholders to determine needs, the use of external consultants to draft plans, successive deliberations and votes in the town council, phases in the procurement procedure, etc.)<sup>28</sup>. The case of the City of Liège demonstrates the interest of our method to obtain information from a reluctant authority. In contrast to conventional data collection methods, such as interviews or informal requests for documents, FOI requests ultimately enable the acquisition of documents that the administration initially refused to disclose, provided that sufficient perseverance is demonstrated.

The data collected does indeed enable us to characterize the scope of surveillance and its market in French-speaking Belgium, provided that substantial efforts are made to prepare and follow up FOI requests. Three comments on the relationship between qualitative and quantitative approaches are worth making. Firstly, the administrative documents obtained often provide little information on the motivations, affects or conflicts that drive the actors involved in surveillance. Secondly, in a few rare cases, FOI requests provide unique insights into the administrative processes involved in acquiring surveillance systems, which could enrich qualitative research. Thirdly, a move toward generalization becomes possible if a substantial number of entities provide comparable responses, thereby enabling case studies to be placed in a more general context. The following section continues, at another level, this reflection on the articulation of our data-gathering enterprise with other forms of scientific and political investigation.

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28 The public procurement documents received also include information on the purchase of BriefCam licences, a controversial\* algorithmic video surveillance software. While the documentation of algorithmic video surveillance was an integral part of our objectives in requesting public procurement documents, the overly broad formulation of our FOI requests may have enabled a number of authorities to omit communicating anything to us on this technology.

\*Cf. Who Profits, "BriefCam" (available online at <https://whoprofits.org/companies/company/6672?briefcam>) [accessed January 16, 2025] and Disclose (2023), "La police nationale utilise illégalement un logiciel israélien de reconnaissance faciale" (available online at <https://disclose.ngo/fr/article/la-police-nationale-utilise-illegalement-un-logiciel-israelien-de-reconnaissance-faciale>) [accessed January 16, 2025].

## **From the scientific relevance to the political resonance of research**

The significance of an inquiry largely depends on its ability to articulate with other scientific inquiries and to resonate with specific political concerns (Kitcher, 2001; Tracy, 2010). In the following sections, we propose to do three things. First, we explore the research projects that might be interested in using our data. Second, we explore how the same data can be mobilized to answer political questions. Third, we look more specifically at some of the practical implications of our inquiry.

From a scientific point of view, the data collected allows us to question the dynamics of the deployment of surveillance systems in at least four ways. First, the acquisition process can be examined in terms of, for example, a change in political majority, a shift in security discourse, the accessibility of the technology, *etc.* Second, the location of surveillance devices enable us to investigate the social geography of surveillance: the prevention in commercial districts, the predisposition to monitor poor neighborhoods, the securing neighborhoods with high crime rates, *etc.* Third, combined with crime statistics, locations should allow us to investigate the concrete effects of cameras, such as the displacement or reduction of certain forms of crime. Finally, market documents provide the basis for a socioeconomic analysis of the surveillance industry: amounts involved, players represented, subcontractors, *etc.* While the data collected can contribute to these different investigations, it will probably need to be combined with other types of approaches and data (Savage & Hyde, 2014; Picaud, 2021).

From a political point of view, the data collected opens up a multitude of possibilities for action. First, it can be used to check the legality of a range of actions: the validity of DPIA when they are produced, the conformity of contracts awarded, or compliance with municipal authorizations for devices surveilling public space. Second, they enable one to contribute to an informed public debate about the use of surveillance technologies – at the local and regional level. The challenge then, as Parasie (2013) points out, is to reflect on the pragmatic conditions for making our database resonate with the concerns of a wider public. The ease afforded by digital technology, especially the ability to file hundreds of FOI requests with just a few clicks, has led us to a kind of illusion about the time it takes to collect and analyze large amounts of data. We were thus caught in a certain “dataist” mentality, reminding us of the critique of technosolutionism that we mobilize as part of our research on surveillance technologies. To overcome this situation, we borrow from the two approaches

described by Parasie (2013): the first, where traditional intermediaries (academics, journalists, activists) make information accessible and translate it for the public; and the second, where the database is co-constructed with its audience. Indeed, the Technoplice campaign calls for the constitution of an appropriable “informational commons” to collectively document surveillance in order to better resist it locally (Anonyme, 2023). Although various initiatives have sprung up around this data collection<sup>29</sup> (Préludde, 2024), “most of the activists who embarked on this type of project quickly found that their sites and applications were not being taken up by audiences, despite their considerable efforts” (Parasie, 2013 : p. 153, *our translation*). While we don’t think the picture is all that bleak, as surveillance enjoys a certain amount of attention, it must be said that the study and critique of surveillance remains a niche subject.

Finally, the empirical inquiry itself is inextricably linked to a number of practical effects. First, any FOI request, directly confronting administrations with issues of administrative transparency, is likely to contribute to (i) the institutionalization of response procedures, and (ii) the evolution of the administration’s position with respect to these requests. Secondly, the administrative or judicial steps taken (administrative appeal, formal notice) produce concrete legal and political effects, contributing in our case to the creation of a jurisprudence favorable to the obligation to transmit documents. Our FOI requests also highlight the failures of the administrations and urge them to comply with their legal obligations (see above on DPIA). Third, and finally, we have been directly involved in public debates on administrative transparency issues, by contributing to press dossiers on the subject or attending parliamentary hearings on transparency reform.

## Conclusion

The aim of this article was to assess the relevance of the systematic use of FOI requests as a data collection method from public administrations. Specifically, we filed more than 350 FOI requests to police forces and municipal administrations in order to gradually build a database on the use of surveillance devices in French-speaking

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29 Doumerx L., Debailleul C. and Morandi M. (2022), “Superfloukse”, Radiola (available online at <https://radiola.be/productions/superfloukse>); Technoplice Belgium (2021), “Installation cartographique dans la vitrine de l’association Constant” (available online at [https://constantvzw.org/site/Constant\\_V-Technoplice,3479.html](https://constantvzw.org/site/Constant_V-Technoplice,3479.html)); Barricade (2022), “Rencontre avec le collectif Technoplice, Nos vies épiées” (available online at <https://barricade.be/agenda/2022/02/17/rencontre-collectif-technoplice>) [addresses consulted on January 16, 2025].

Belgium. We proposed to evaluate the relevance of this method in terms of three scientific virtues:

- From the point of view of data completeness, in most cases the requested documents could only be obtained after a considerable amount of follow-up work: from filing FOI requests to lodging legal appeal, not to mention the contentious exchange of correspondence with the authorities.
- From the point of view of data accuracy, FOI requests generally result in the communication of information that, while not exhaustive, appears to be substantially correct: strategies of concealment or falsification are complicated by the very nature of the process.
- From the point of view of data significance, the information obtained is well suited to a variety of scientific investigations (geography of cameras, surveillance industry, etc.), as well as political ones (compliance with the law and public debate).

While FOI requests are far from guaranteeing the automatic production of the information in question, they are nevertheless a relevant method of systematic data collection that enriches case studies on the dynamics of the deployment of surveillance systems. We believe that its use as a systematic data collection method for documenting a public policy area should be the subject of further scholarly research. The above developments also lead us to reflect on some of the practical conditions that promote the success of FOI requests.

First, the discussion of the internal factors specific to our research team allowed us to highlight certain strengths and weaknesses of our methodological choices. The involvement of the *Human Rights League* seems to have been an important factor in legitimizing our FOI requests and ensuring the success of our legal appeal. More generally, the perseverance and diversity of our research team, consisting of university researchers from various disciplines, association workers and political activists, seems to have been a key factor in allowing us to carry out, without funding, a data collection over a long period of time that required a variety of skills: administrative, legal, statistical and sociological.

Second, the statistical analysis of external factors specific to the administrations contacted suggests that the response rate is positively affected when the contacted entity has a legal obligation of effective transparency, when the administrative culture is more inclined to provide information, when the municipality is governed by a political party favorable to administrative transparency and when the administrative department is able to absorb the workload required to respond. We believe that data

collection strategies, as well as the scientific literature, would benefit from reflecting on the ways in which these internal and external factors interact, in the hope of increasing the effectiveness of the method.

Third, we were led to reflect on some of the limitations of FOI requests as a data collection method compared to other social science research methods. First, the inherent conflictuality of FOI requests, in stark contrast to more conventional methods of data collection, can in some cases lead to resentment on the part of certain administrations and hinder data collection. Second, the complexity of the right of access poses another danger: while we initially wanted to mobilize FOI requests only to document surveillance, we gradually found ourselves in a research process in which administrative transparency became an issue in its own right – from a means to an end. Finally, because of the distance from the data that it implies, the right of access could impoverish the understanding of the processes studied if it is not combined with other research methods (interviews, participant observation, *etc.*). It is up to researchers to remain attentive to the effects of the methods they mobilize.

We hope to have sufficiently shown the value of systematic recourse to FOI requests as a data collection method in social sciences, especially in contexts in which administration seek to hide information from public scrutiny. From a scientific perspective, the method demands from inquirers a particular attention to the formulation of requests (status of expeditors, document requests, legal formulations, *etc.*) as well as to the treatment of responses (mail reminders, administrative appeals, statistical analyses, *etc.*). From a political perspective, the nature of the method is likely to carry a number of practical consequences: transformation of the collective of inquiries, changes in administrative jurisprudence, collaboration with journalists, *etc.* For all these reasons, we intend to keep using this method so as to fuel our database documenting the surveillance infrastructure in Belgium.

## **Acronyms and abbreviations**

DPIA: Data Protection Impact Assessment

LDH: League des droits humains

LQDN: La Quadrature du Net

GDPR: General Data Protection Regulation

## **FOI request sent to municipalities and police forces in French-speaking Belgium in 2022**

À l'attention de Madame/Monsieur la/le Bourgmestre,

Objet : Transparence administrative – Demande d'informations *via* le site de Transparencia.

Dans le cadre de ses missions et conformément à son objet social, la Ligue des droits humains s'intéresse au déploiement des dispositifs de surveillance dans l'espace public.

Aussi, je me permets de vous solliciter en vertu du droit à la transparence consacré par l'article 32 de la Constitution et de l'article de la loi du 12 novembre 1997 relative à la publicité de l'administration dans les provinces et les communes, afin d'obtenir une copie informatisée des documents administratifs suivants :

1. la liste des caméras fixes dans des lieux ouverts accessibles au public, en ce compris les localisations et les responsables de traitement ;
2. les documents administratifs relatifs à l'installation desdites caméras : les avis délivrés par la commune à destination des responsables de traitement conformément à l'article 5 de la loi du 21 mars 2007 réglant l'installation et l'utilisation de caméras de surveillance ;
3. les analyses d'impact et les documents relatifs aux marchés publics (appels d'offres, cahiers de charges, documents d'attribution, contrats signés pour l'ensemble des marchés passés, dans le cas des marchés classiques et des accords-cadres) concernant les systèmes de surveillance (caméras fixes et mobiles, visuelles et/ou thermiques, drones et bodycams, ANPR, commutateurs et logiciels, etc.) acquis depuis 2000 par la commune, conformément aux lois du 21 mars 2007 et du 17 juin 2016 relatives aux marchés publics et de l'arrêté

royal du 30 juin 2017 relatif à la passation des marchés publics dans les secteurs classiques.

Je vous remercie de bien vouloir réserver les suites utiles à ce courrier dans le délai de réponse de trente jours prescrit par la loi du 12 novembre 1997.

Je vous prie de croire, Madame/Monsieur la/le Bourgmestre, à l'expression de nos sentiments distingués.

Pour la Commission nouvelles technologies et vie privée,  
Emmanuelle de Buisseret Hardy, conseillère juridique  
Ligue des droits humains

### **Contingency table cross-referencing response rates with the political color of the mayors and the urban or rural nature of the municipalities**

Mayor's political color	Typology	Requests	Responses	Response rate	Deviation from average
Ecolo	Urbain	7	5	71,4 %	16,9 %
	Rural	3	2	66,7 %	19,4 %
	Total	12	8	66,7 %	16,3 %
CDH	Urbain	21	14	66,7 %	12,1 %
	Rural	35	18	51,4 %	4,1 %
	Total	65	35	53,8 %	3,5 %
MR	Urbain	31	15	48,4 %	- 6,2 %
	Rural	55	26	47,3 %	0,0 %
	Total	99	47	47,5 %	- 2,9 %
PS	Urbain	45	22	48,9 %	- 5,7 %
	Rural	26	12	46,2 %	- 1,1 %
	Total	82	40	48,8 %	- 1,6 %
TOTAL	Urbain	110	60	54,5 %	
	Rural	129	61	47,3 %	
	Total	276	139	50,4 %	

NB: Municipalities are classified as "urban" when they have official status as a City or belong to the agglomeration of a large urban region; they are classified as "rural" if

they belong neither to the “urban” category nor to a suburb, as defined by Vanderstraeten and Van Hecke (2019).

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