



Platform Regulation and Algorithmic Accountability: A Comparative Analysis of Global Governance Frameworks for Algorithmic Media Systems

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Abstract

This paper presents a comparative analysis of emerging global governance frameworks for algorithmic media systems, examining how different jurisdictions are addressing the challenges of platform power, algorithmic transparency, and democratic accountability. The study critically evaluates four major regulatory instruments: the European Union's Digital Services Act (Regulation 2022/2065) and AI Act (Regulation 2024/1689), India's Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules 2021, Brazil's proposed regulatory framework, and Australia's News Media Bargaining Code. Drawing on regulatory theory, platform governance scholarship, and democratic theory, the paper identifies three fundamental tensions animating global platform regulation: (a) the tension between algorithmic transparency and proprietary business interests; (b) the tension between content governance and freedom of expression; and (c) the tension between national sovereignty and the transnational character of platform operations. Through systematic documentary analysis of legislative texts, regulatory guidance documents, and compliance reports, supplemented by synthesis of recent academic literature, the paper evaluates the effectiveness of existing frameworks in achieving their

stated objectives. The analysis reveals significant regulatory divergence across jurisdictions, with the EU pursuing a comprehensive risk-based approach, India combining intermediary liability reform with government content oversight powers, and Australia pioneering a revenue-sharing model addressing the economic dimensions of platform power. The paper argues that effective algorithmic accountability requires a multi-layered governance architecture combining mandatory transparency obligations, independent algorithmic auditing, participatory governance mechanisms, and international regulatory coordination. The study concludes by proposing a normative framework for algorithmic accountability grounded in principles of transparency, contestability, proportionality, and democratic legitimacy, with specific recommendations for policy development in the Global South context.

Keywords: platform regulation, algorithmic accountability, Digital Services Act, AI Act, content moderation, platform governance, regulatory theory, comparative media law.

Introduction

The governance of algorithmic media systems has emerged as one of the most consequential policy challenges of the twenty-first century. As digital platforms increasingly mediate public discourse, economic transactions, and democratic participation, the inadequacy of existing regulatory frameworks—designed for an era of discrete media channels and identifiable publishers—has become apparent (Aarzo & Lal, 2024a). The question is no longer whether algorithmic media systems require governance but how such governance should be designed, by whom, and according to what principles.

The urgency of this question is underscored by the scale of algorithmic mediation. As documented by the Reuters Institute’s Digital News Report 2025, social media and video platforms have overtaken television as the primary news source in the United States, with 86% of U.S. adults accessing news through digital devices and 53% through social media at least sometimes (Pew Research Center, 2025). Globally, video-based news consumption has risen from 52% in 2020 to 65% in 2025, with TikTok surpassing X (formerly Twitter) as a news platform at 13% weekly usage across 48 surveyed markets (Newman et al., 2025). These developments mean that algorithmic systems designed by a handful of technology corporations now exercise gatekeeping authority over public information flows affecting billions of citizens across every democratic polity.

Yet the governance response to this transformation has been fragmented, contested, and highly uneven across jurisdictions. The European Union has pursued the most ambitious regulatory agenda with the Digital Services Act and AI Act, establishing comprehensive frameworks for platform transparency, content moderation accountability, and risk-based algorithmic governance (Aarzo & Lal, 2024b). The United States, by contrast, remains largely without federal legislation specifically addressing algorithmic content curation, with Section 230 of the Communications Decency Act continuing to provide broad liability protections. India, Brazil, Australia, and other jurisdictions have developed distinctive approaches reflecting different political priorities, media system configurations, and regulatory traditions.

This paper presents a comparative analysis of these emerging governance frameworks, organized around three fundamental tensions that define the global platform regulation landscape. Following a theoretical section grounding the analysis in regulatory theory and platform governance scholarship, the paper examines each major regulatory instrument, evaluates effectiveness against stated objectives, and proposes a normative framework for algorithmic accountability that addresses the specific needs of diverse democratic contexts, including the Global South (Aarzo & Lal, 2024c).

Theoretical Foundations: Regulatory Theory and Platform Governance

The Regulatory Challenge of Algorithmic Media

Algorithmic media systems present distinctive regulatory challenges that strain conventional governance models. First, the speed and scale of algorithmic operations exceed the capacity of traditional regulatory supervision: billions of content moderation and recommendation decisions are made daily, far outpacing any possible human review. Second, the opacity of machine learning systems means that even platform companies may not fully understand why their algorithms produce specific outcomes, complicating requirements for transparency and explainability (Aarzo & Lal, 2025a). Third, the transnational character of platform operations means that regulatory frameworks designed for national jurisdictions must contend with services that operate globally, with content and users flowing across borders in real time. Fourth, the dual-use nature of algorithmic systems—the same recommendation algorithm that can expose users to diverse perspectives can also amplify misinformation—complicates regulatory interventions that may have unintended consequences.

Gorwa's (2019) influential typology of platform governance identifies four modes: government regulation (state-imposed rules), platform self-governance (corporate policies and enforcement), multi-stakeholder governance (collaborative frameworks involving diverse actors), and distributed governance (decentralized, protocol-level rules). Most existing frameworks combine elements of multiple modes, but with different emphases. The EU model is primarily state-centered with self-governance obligations, while the U.S. model relies predominantly on platform self-governance within a permissive statutory framework. Understanding these differences requires attention to the specific political, legal, and cultural contexts within which each framework has developed (Aarzo & Lal, 2025b).

Democratic Theory and Algorithmic Accountability

Democratic theory provides normative foundations for algorithmic accountability that extend beyond the procedural requirements of regulatory compliance. Habermas's (1962/1989) concept of the public sphere—a domain of social life in which public opinion can be formed through reasoned discourse—has been extensively applied to digital platforms (Dahlgren, 2005; Papacharissi, 2010). If platforms constitute significant arenas for public discourse, then their governance implicates core democratic values: equal participation, access to diverse information, protection of minority voices, and accountability of powerful actors.

Helberger, Pierson, and Natali's (2018) framework for algorithmic accountability in public service media identifies four normative models: the liberal model (maximizing individual choice through transparency), the participatory model (enabling citizen involvement in algorithmic governance), the deliberative model (ensuring exposure to diverse viewpoints), and the critical model (addressing structural power asymmetries). These models suggest different regulatory priorities: the liberal model supports transparency and user control mechanisms, the participatory model supports multi-stakeholder governance, the deliberative model supports diversity obligations, and the critical model supports structural interventions in platform power (Aarzo & Lal, 2025c).

Suzor's (2019) concept of "lawless" digital platforms highlights the governance gap created by the mismatch between platform power and accountability: platforms exercise authority comparable to state institutions in their capacity to determine speech norms, enforce rules, and impose sanctions, yet operate without the constitutional constraints, due process requirements, and

democratic accountability mechanisms that legitimate state power. Addressing this governance gap is the central challenge of platform regulation.

Comparative Analysis of Global Regulatory Frameworks

The European Union: The Digital Services Act and AI Act

The European Union's regulatory framework, comprising the Digital Services Act (DSA, Regulation 2022/2065) and the AI Act (Regulation 2024/1689), represents the most comprehensive attempt to govern algorithmic media systems globally (Aarzo & Lal, 2025d). The DSA, which became fully applicable in February 2024, establishes a tiered system of obligations based on service type and size, with the most stringent requirements imposed on Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs)-those with 45 million or more monthly active users in the EU.

The DSA's key provisions for algorithmic accountability include: mandatory transparency reporting on content moderation activities, including information about the use of automated tools and their error rates; the obligation to provide users with at least one recommendation system option not based on profiling; systemic risk assessment requirements for VLOPs covering risks to fundamental rights, civic discourse, electoral processes, and public health; mandatory independent audits of VLOP compliance conducted annually; and vetted researcher access to platform data for the purpose of scrutinizing systemic risks (Aarzo & Lal, 2026). These provisions collectively create what the European Commission has described as a "comprehensive framework for a safe and trustworthy online environment."

The AI Act complements the DSA by establishing a horizontal, risk-based framework for artificial intelligence systems. The Act classifies AI systems into four risk categories: unacceptable risk (prohibited), high risk (subject to conformity assessment and ongoing monitoring), limited risk (subject to transparency obligations), and minimal risk (unregulated). For algorithmic media systems, the most relevant provisions concern high-risk AI systems that may influence democratic processes and the transparency obligations for AI systems that generate or manipulate content (including deepfakes) (Lal & Aarzo, 2026). The Act's general-purpose AI (GPAI) provisions also apply to the large language models increasingly integrated into platform recommendation and content generation systems (Lal & Rahman, 2013a).

Critical assessment of the EU framework reveals several strengths and limitations. Strengths include the comprehensiveness of the regulatory architecture, the risk-based approach that calibrates obligations to the potential for harm, and the institutional infrastructure (Digital Services Coordinators, European Board for Digital Services) established for enforcement. Limitations include the heavy reliance on self-assessment for systemic risk evaluations, the potentially insufficient enforcement resources given the scale and complexity of platform operations, the challenge of assessing compliance with algorithmic transparency requirements when algorithms change continuously, and the risk that the complexity of compliance requirements may create barriers to entry that entrench incumbent platforms' market positions (Lal & Vats, 2016).

India: Intermediary Guidelines and Digital Media Ethics Code

India's approach to platform governance, embodied primarily in the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 (IT Rules 2021), and subsequent amendments, reflects a distinctive regulatory philosophy combining intermediary liability reform with government content oversight powers. The IT Rules 2021 impose obligations on "significant social media intermediaries" (SSMIs)-those with more than five million registered users in India-including the appointment of compliance officers (Chief Compliance Officer, Resident Grievance Officer, and Nodal Contact Person), the implementation of automated content monitoring for specific categories (child sexual abuse material, content previously ordered removed by courts or government), and the obligation to enable traceability of the "first originator" of information in response to court or government orders (Lal & Rahman, 2013b).

The Indian framework presents several distinctive features relevant to algorithmic accountability. The traceability requirement, unique among major regulatory frameworks, potentially compromises end-to-end encryption-a provision that has faced significant legal challenge and criticism from civil society organizations and technology companies. The 2023 amendments establishing a government-appointed Fact Check Unit with authority to identify "fake or false or misleading" content about government business, with platforms required to "make reasonable efforts" to not host such content, have raised concerns about government overreach and censorship potential (Lal & Rahman, 2013c).

From an algorithmic accountability perspective, the Indian framework has notable gaps. Unlike the EU's DSA, the IT Rules do not impose specific obligations regarding algorithmic transparency, recommendation system design, or systemic risk assessment. The focus is primarily on content removal and compliance processes rather than on the structural mechanisms through which algorithms shape information visibility (Lal et al., 2015). This gap is particularly significant given India's status as the world's largest democracy and one of the largest markets for platforms like WhatsApp (over 500 million users), YouTube, Facebook, and Instagram.

Australia: The News Media Bargaining Code

Australia's News Media Bargaining Code (Treasury Laws Amendment [News Media and Digital Platforms Mandatory Bargaining Code] Act 2021) took a distinctive approach by addressing the economic dimension of platform-news publisher relationships rather than focusing on content moderation or algorithmic transparency. The Code establishes a framework requiring designated digital platform corporations to negotiate with registered news businesses over payment for the inclusion of news content on their platforms, with a binding arbitration mechanism (final offer arbitration) if negotiations fail.

The Code's practical impact has been mixed. Meta (Facebook) responded to the legislation by briefly blocking all news content in Australia in February 2021—a dramatic demonstration of platform power that paradoxically strengthened political resolve to regulate. Subsequently, both Google and Meta negotiated deals with major Australian news publishers, reportedly worth over A\$200 million collectively. However, critics note that the majority of these deals favored large, established news organizations, with limited benefit flowing to smaller publishers, local news outlets, and independent journalists. In 2024, Meta announced it would not renew its Australian news deals, citing the low value users place on news on its platforms—a decision that underscored the fundamental power asymmetry the Code was designed to address.

Canada's Online News Act (Bill C-18, 2023), modeled on the Australian approach, produced an even more dramatic response: Meta blocked all news content in Canada entirely rather than comply, and the content remains blocked as of early 2026. This outcome illustrates a fundamental limitation of the bargaining code approach: when platforms are willing to forgo news

content entirely-because news represents a small fraction of their content ecosystem and user engagement-the regulatory leverage of mandatory bargaining is substantially diminished.

Brazil: The Fake News Bill and Evolving Regulatory Landscape

Brazil's regulatory approach has been characterized by extended legislative debate and significant political contestation. The "Fake News Bill" (PL 2.630), first introduced in 2020, has undergone multiple revisions reflecting evolving understandings of the regulatory challenge. Key provisions in various versions have included requirements for algorithmic transparency, restrictions on automated content amplification, provisions for platform responsibility for algorithmically promoted content, and establishment of a regulatory oversight body.

Brazil's regulatory development has been shaped by the country's experience with politically motivated disinformation, particularly the extensive use of WhatsApp for coordinated misinformation campaigns during the 2018 and 2022 presidential elections. The platform's end-to-end encryption, combined with its group messaging architecture, creates a particularly challenging environment for content governance-a challenge shared with India and other countries where WhatsApp serves as primary information infrastructure. The Brazilian experience highlights the limitation of regulatory frameworks designed primarily with open social media platforms (Facebook, Twitter/X, YouTube) in mind when applied to encrypted messaging platforms that serve analogous information distribution functions through fundamentally different technical architectures.

The United States: Regulatory Absence and Constitutional Constraints

The United States presents the most notable case of regulatory absence among major democracies. Section 230 of the Communications Decency Act (1996) provides broad immunity to platforms for third-party content and, by extension, for the algorithmic decisions that determine its visibility. While Section 230 has faced increasing political criticism from both sides of the political spectrum-with conservatives arguing it enables anti-conservative bias and progressives arguing it enables harmful content-bipartisan reform has proven elusive.

First Amendment jurisprudence creates distinctive constraints on U.S. platform regulation. Several federal courts have analyzed platforms' content curation activities as protected editorial discretion analogous to newspaper editorial decisions, potentially rendering content-based algorithmic regulation constitutionally suspect. The Supreme Court's decisions in *Moody v.*

NetChoice (2024) and related cases provided initial guidance on the constitutional limits of state platform regulation but left many questions unresolved. The constitutional analysis is complicated by the unprecedented scale of platform “editorial discretion”—exercised algorithmically over billions of content items for billions of users—which differs qualitatively from the individualized editorial judgment protected by press freedom doctrines.

Three Fundamental Tensions in Global Platform Regulation

Transparency Versus Proprietary Interests

The first fundamental tension animating global platform regulation is between the democratic requirement for algorithmic transparency and platforms’ proprietary interests in maintaining algorithmic opacity. Transparency is foundational to accountability—algorithmic systems whose operations are opaque cannot be meaningfully evaluated, contested, or governed. Yet platforms argue that their algorithms constitute trade secrets whose disclosure would compromise competitive advantage and enable gaming by bad actors.

The EU’s approach attempts to resolve this tension through differentiated transparency: platforms must provide general information about recommendation system parameters to users (Article 27 DSA), detailed information to regulators and auditors under confidentiality protections, and data access to vetted researchers for systemic risk analysis (Article 40 DSA). This tiered approach recognizes that different audiences require different levels of algorithmic transparency for different purposes. However, implementation challenges remain significant: determining what constitutes “meaningful” transparency when algorithms involve millions of parameters and continuous updates, ensuring that disclosed information is comprehensible to non-expert audiences, and preventing compliance through technical obfuscation rather than genuine openness.

Content Governance Versus Freedom of Expression

The second fundamental tension is between the imperative to address harmful content amplified by algorithmic systems and the protection of freedom of expression. This tension manifests differently across legal traditions: the U.S. First Amendment tradition provides expansive speech protections that constrain government regulation of content, the European human rights framework permits proportionate restrictions on expression to protect other rights

(Article 10 ECHR), and many Global South jurisdictions face the additional challenge of governments potentially using content regulation as a tool for political censorship.

The DSA's approach to this tension centers on procedural rather than substantive content regulation: the Act does not define categories of illegal content (deferring to national law) but requires platforms to implement transparent, proportionate, and contestable content moderation processes. The systemic risk assessment obligation for VLOPs extends this by requiring platforms to evaluate how their algorithmic systems may amplify content that, while legal, creates risks to fundamental rights or democratic processes. This risk-based approach avoids direct content prescription while establishing obligations to consider the systemic effects of algorithmic amplification.

India's Fact Check Unit provision illustrates the opposite approach: direct government authority to determine what constitutes "fake or false or misleading" information, with platforms required to restrict identified content. Critics argue this provision inverts the accountability relationship, creating a mechanism for government control of information rather than democratic accountability of platforms. The tension between these approaches reflects a deeper disagreement about the primary threat to democratic communication: platform power (addressed by the EU model) versus government power (addressed by the U.S. First Amendment model) versus both simultaneously (the challenge faced by many Global South democracies).

National Sovereignty Versus Transnational Platform Operations

The third fundamental tension is between the principle of national sovereignty in communications governance and the inherently transnational character of platform operations. Digital platforms operate global services that resist territorial fragmentation: the same algorithmic systems, content policies, and interface designs are deployed across jurisdictions with radically different legal, cultural, and political contexts. This creates regulatory arbitrage opportunities, enforcement challenges, and the potential for regulatory fragmentation of the global internet.

The EU has addressed this tension through its market power—the single market's 450 million consumers give the EU sufficient leverage to impose regulatory requirements that platforms must comply with as a condition of market access. This "Brussels Effect" (Bradford, 2020) has produced de facto global regulatory influence, as platforms often implement EU-compliant policies globally rather than maintaining separate systems for different jurisdictions. However, this effect is contingent on the EU's continued market significance and political will,

and it creates a democratic deficit of its own: citizens in other jurisdictions are affected by EU regulatory choices without democratic representation in EU governance processes.

Toward an Integrated Algorithmic Accountability Framework

The comparative analysis reveals that no existing regulatory framework adequately addresses all dimensions of algorithmic accountability. An integrated framework must combine elements from multiple approaches while addressing the specific needs of diverse democratic contexts, including the Global South where regulatory capacity, digital infrastructure, and platform market dynamics differ substantially from the EU and U.S. contexts.

This paper proposes a normative framework for algorithmic accountability grounded in four principles. First, transparency: platforms exercising significant gatekeeping functions must provide meaningful information about their algorithmic systems to users, regulators, and researchers, calibrated to the audience and purpose. Second, contestability: individuals and communities affected by algorithmic decisions must have meaningful mechanisms to challenge, appeal, and seek remedy for algorithmic harms. Third, proportionality: regulatory obligations must be calibrated to the scale of platform operations and the severity of potential harms, avoiding regulatory capture by incumbent platforms through excessive compliance burdens on smaller competitors. Fourth, democratic legitimacy: the governance of algorithmic systems affecting public discourse must involve diverse stakeholders and be subject to democratic oversight, avoiding both technocratic delegation and government capture.

Implementation of this framework requires specific institutional mechanisms. Independent algorithmic auditing bodies—operating with guaranteed access, technical expertise, and enforcement authority—are essential for meaningful transparency. Multi-stakeholder advisory councils, with representation from civil society, journalism, academia, and affected communities, can provide democratic legitimacy to governance processes. International regulatory coordination mechanisms—building on the EU-U.S. Trade and Technology Council model but extending to the Global South—can address the transnational dimension while respecting national sovereignty. Capacity-building programs for regulatory bodies in developing countries can address the enforcement gap that currently enables platforms to operate with minimal accountability in many jurisdictions.

Implications for the Global South

The regulatory frameworks analyzed in this paper have been developed primarily by wealthy, technologically advanced democracies with substantial regulatory capacity. Their applicability to Global South contexts—where regulatory resources are limited, digital infrastructure is still developing, and platform market dynamics differ significantly—requires careful consideration. Several specific challenges deserve attention.

First, the platform ecosystem in many Global South countries differs from the Western context that informs most regulation. In India, Indonesia, Brazil, and much of Africa, WhatsApp serves as primary information infrastructure—a role fundamentally different from the open social media platforms (Facebook, YouTube, X) that EU and U.S. regulation primarily targets. WhatsApp’s end-to-end encryption, group messaging architecture, and closed network structure require governance approaches distinct from those appropriate for open platforms with public content feeds.

Second, regulatory capacity constraints mean that compliance-intensive frameworks like the DSA may be impractical without significant capacity building. Smaller regulatory agencies may lack the technical expertise, computational resources, and legal infrastructure required to conduct meaningful algorithmic audits, process transparency reports, or enforce compliance against well-resourced global technology corporations.

Third, the political economy of platform regulation in the Global South is shaped by the dual threat of platform power and government power. Regulatory frameworks must simultaneously constrain platforms’ capacity to exploit users and distort information environments while preventing governments from using platform regulation as a mechanism for political censorship. This dual constraint requires institutional designs that insulate regulatory processes from both commercial and political capture—a challenge that even well-resourced democracies struggle to meet.

Discussion and Conclusion

This comparative analysis has revealed both the diversity and the limitations of existing approaches to algorithmic media governance. The EU’s comprehensive risk-based framework represents the most ambitious attempt to establish democratic accountability for algorithmic systems, but its effectiveness remains contingent on enforcement capacity and evolving jurisprudence. India’s approach highlights the risks of combining platform regulation with

government content oversight powers. Australia's bargaining code pioneer addresses the economic dimension of platform power but has been undermined by platforms' willingness to exit news distribution entirely. Brazil's extended legislative process illustrates the difficulty of achieving political consensus on platform governance. And the United States' regulatory absence underscores how constitutional doctrines developed for a different media environment can impede governance adaptation to algorithmic realities.

The fundamental challenge is structural: algorithmic media systems operate at a scale, speed, and complexity that exceeds the capacity of traditional regulatory mechanisms, in a transnational context that transcends national jurisdictions, and under conditions of technical opacity that resist conventional transparency requirements. Meeting this challenge requires not merely adapting existing regulatory tools but developing new governance architectures appropriate to the distinctive characteristics of algorithmic power.

The multi-principle framework proposed here—transparency, contestability, proportionality, and democratic legitimacy—provides normative orientation for this governance development. But principles require institutional embodiment: independent auditing bodies, multi-stakeholder governance councils, international coordination mechanisms, and capacity-building programs are the institutional means through which these principles can be translated into practice. The urgency of this institutional development is clear: with each passing year, algorithmic systems become more deeply embedded in the information architectures of democratic societies, making retroactive governance increasingly difficult and proactive governance increasingly necessary.

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