Framework for Social Media Regulations in Pakistan

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Abstract

Social media has emerged as an instrument of online discourse which enables people to create and share content at a prodigious rate. Social media is fast-changing public engagement environment in society and is setting trends and agendas on matters that range from the environment and politics to technology and to entertainment industry. However, while social media presents a worthy platform to engage, it has also given unregulated power to state and non-state actors to spread misinformation, false news, and disinformation. As the unregulated power of state and non-state actors is manipulating the society, the governments have demanded the social media networks to regulate their content. However, social media networks have been unable to address the concerns of many. Due to this reason, states have initiated the process of adopting social media regulations to address their unique issues. This paper presents three options for social media regulation frameworks: firstly, self-regulation by social media companies, secondly, government-framed regulations that suggest oblige emphasize targeted social media rules to address their shortcomings, lastly, comprehensive government-framed regulatory mechanism that adopts a broad-based approach to social media rules. The finds of this paper conclude that limited government-framed regulations would be the most suitable solution for Pakistan and recommends as to how Pakistan can create and adopt this type of framework.

Keywords: Social Media, Social media framework, Social media regulation

Introduction

Social media networks such as Facebook, Instagram, Snapchat, YouTube, Twitter and so on are user's platform that allows engagement and socialization with others. On one hand social media has provided means for decent exchange, while on the other hand, it has given unregulated power to the state and non-state actors. These actors, often use social media networks as a tool to manipulate the masses and disseminate misinformation and disinformation. The non-state actors have also been seen using social media networks as an essential mean to network, raise funds, train, recruit and influence the populace(Weimann, 2016). According to a report by the US's National Institute of Justice, social media played a prominent role in inspiring recruitment for Al-Qaeda and Hezbollah(National Institute of Justice, 2017). Another report by RAND disclosed that social media was a resourceful tool for ISIS, which was neither new nor unique(Ward, 2018).

Furthermore, it is not only non-state actors who engage social media to acquire their desired ends, states are also seen using social media networks to pursue their national interest. According to the University of Oxford report, about 81 countries were employing strategies to manipulate public opinion around in globe in 2020(Bradshaw, Bailey, & Howard, 2021). This is not a novel activity rather states are evolving their capacities to manipulate social media for designed targets. For instance, the Cambridge Analytica scandal revealed that people's data from social media networks was misused by Trump's digital operators to create voter profiles (Wong, 2019). Similarly, the Disinfo Lab report on Indian Chronicles revealed India's 15 year-long disinformation operation against Pakistan in EU and UN(Machado, Alaphilippe, Adamczyk, & Grégoire, 2020). It has been witnessed that most rivalries, whether originated in the America, South Asia, Africa, Middle East or Europe, have found their way to social media networks as it engages more people in the cause(Byman, 2022).

Social media networks have been the go-to tool of such wicked voices as the medium of social media is easily accessible with vast reach and limited oversight that allows the spread of false agendas, misinformation, fake news, disinformation and has the capacity of violation of privacy. Due to this, manipulation through social media networks has become an uncontrolled feature of social media. Such occurrences not only exploit the socio-economic and political weaknesses of the states but also places entire national security at risk. The risks to national security by social media are often quoted as "Militarization of Social Media" (Shafeeq, 2021). Under this aspect, states are exploiting social media to practice fifth-generation warfare by conducting Information Operations (IO) including Psychological Operations (PsyOps), digital warfare and media warfare. Such operations degrade the will and morale of the nations, in addition to creating adverse social, cultural, religious and political consequences.

In order to counter the above stated adverse impacts of social media, social media networks have taken measures, however, the effort is ineffective (Stening, 2021). Therefore, it is important that the states take calculated and targeted measures to regulate social media. Most literature on social media examines the behavioral or organizational aspects (Kapoor, et al., 2018). The regulatory aspect of social media is hardly debated and research on a framework for social media regulations is insufficient. In order to cover this literature gap, this paper attempts to analyse frameworks for the regulation of social media and looks at three options; self-regulation, limited government-framed regulations and comprehensive government-framed regulations. In the end, the paper suggests a framework for regulating social media in Pakistan.

Social Media Regulatory Frameworks

The following debate explores the regulatory frameworks of social media that governments can look into and adopt as per their requirements. However, the governments would need to keep in mind that social media networks have greater influence, therefore, adoption of a model that suits

them would depend on how much the government regulations can impact social media networks.

Self-Regulation: Under the conception of self-regulation, social media networks regulate their content by taking measures that address their transgressions and shortcomings. For this purpose, social media networks develop community guidelines and terms of service that aim to curtail the adverse impact on society. According to Harvard Business Review, self-regulation is "steps companies or industry associations take to preempt or supplement governmental rules and guidelines" these could range from self-monitoring to proactive corporate social responsibility CSR initiatives(Cusumano, Gawer, & Yoffie, 2021). For this purpose, social media networks have developed monitoring bodies that remove the undesired content. YouTube, for self-regulation, removed 6.23 million videos in 2021 (Ceci, 2021). Similarly, Twitter removed more than 70,000 accounts affiliated with Capital Riots(Romm & Dwoskin, 2021). Due to increased influence of social media networks, demands and expectations of the governments to regulate social media networks content are increasing(Samples, 2019). For this reason, social media networks are taking measures to self-regulate their platforms. For instance, according to an Op-Ed in the New York Times, Facebook informed that it has assembled an independent board overseeing the site's regulation(Botero-Marino, Greene, McConnell, & Thorning-Schmidt, 2020). The board will address the most pressing issues such as protecting people's privacy, controlling hate speech and eradicating online harassment. However, many remain skeptical if such a body would be able to achieve the desired task(Arun, 2020)(Reuters, 2020).

Limited Government-Framed Regulations:

Limited government-framed regulations refer to the creation of targeted and issue focused social media regulations by the public authorities. Within limited government-framed regulations fall the government rules that are developed with a targeted focus to address a specific issue. This approach would not require the social media networks to alter their

business or implement structural alterations. It would only require the social media networks to comply with governments and address their unique issues. For instance, after the Russian intervention in the 2016 US elections, the US introduced Honest Ads Act in 2019 with an issue focused target on banning foreign nationals from buying political ads online(Lau, 2020). Similarly, in 2018, the government of California introduced the California Consumer Privacy Act (CCPA) with a limited and focused target for the protection of data of users residing in California. These acts did not require changes in social media business algorithms but only required the social media networks to give their consumers a notice.

Comprehensive Government-Framed Regulations:

Comprehensive government-framed regulations are proposed by the public authorities with a broad framework of aims, goals and vision. This has a vast scope and would require greater oversight of social media companies by the government. This type of intervention by the government would require reorganizing and restructuring of social media networks in a manner that the regulations present a remedy to the cause of dysfunction instead of mitigating its symptoms. For instance, in 2016, the EU adopted a comprehensive General Data Protection Regulations (GDPR) intending to restructure social media networks in a manner on how they use, store and transfer data(Wolford, 2020). For compliance with the GDPR, the social media networks would require wide-scale privacy alternations(PwC, 2021). Additionally, for comprehensive government-framed regulations, the US government is negotiating on breaking up big social media networks. In 2021, five new bills were passed in the US House of Representatives that aimed at ushering a complete overhaul of the social media networks to reduce the influence of their monopoly(Chant, 2021). If such a bill is accepted, it would require comprehensive alterations in social media networks.

Overview of Pakistan's Proposed Social Media Rules

Pakistan has recently taken steps towards developing social media rules. In this regard under the Prevention of Electronic Crimes Act, 2016, Government of Pakistan has published three rules so far; "Citizens Protection (Against Online Harm) Rules 2020", "Removal and Blocking of Unlawful Online Content Rules 2020", and most recently "the Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards) Rules, 2021".

The 1st set of rules were published by the Ministry of Information Technology and Telecommunication on 21 January 2020 under the title "Citizens Protection (Against Online Harm) Rules 2020" (Government of Pakistan, 2020). These rules received enormous criticism and were termed as a disaster for freedom of expression in Pakistan according to an analysis by Yale Law School(Karanicolas, 2020). After high criticism(Khilji, 2020) from various platforms, the "Citizens Protection (Against Online Harm) Rules 2020"were abolished(Geo News, 2020) and2nd set of social media rules were published on 6 October 2020 by the Ministry of Information Technology and Telecommunication (Moitt) prescribed by the Pakistan Telecommunication Authority under the title "Removal and Blocking of Unlawful Online Content Rules 2020" (The News International, 2021). The 2nd set of rules again received high criticism from local digital rights activities and international outlets(Digital Rights Foundation, 2020)(Nachiappan, 2020)(Hasan, 2021). For instance, Asia Internet Coalition targeted the broad nature of the rules stating that the privacy and freedom of expression under the new rules would be violated(Aisa Internet Coalition, 2020). Most recently, Moitt published the 3rd set of revised rules with the title "the Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards) Rules, 2021"(Government of Pakistan, 2021)in September 2021 repealing "Citizens Protection (Against Online Harm) Rules 2020" and "Removal and Blocking of Unlawful Online Content Rules 2020". The revised rules have not received as much criticism from the national and international outlets as the previous two drafts of the rules did, however, AIC has highlighted that the rules still

include problematic areas (Times of Pakistan, 2021). While Reporters Without Borders (RSF) stated that the new rules were "another attempt by Pakistan's government to censor social media" and also highlighted the need for transparency and responsibility(Reporters Without Borders, 2021).

Analysis of Proposed Social Media Rules in Pakistan

Despite the criticism, it is Pakistan's right to regulate online content in order to avoid public disorder and chaos within its boundaries. It is due time that timely steps are taken in order to regulate social media. Given the power that lies in social media ,it has proven to unleash utter chaos within national boundaries and even across boundaries that has put state security in jeopardy. From this and the above debate, it can be suggested that Pakistan should also take measures towards regulation social media within its boundaries and scope of influence. However, before taking on the responsibility to regulate social media, it is important to look into the possibilities of social media networks regulating themselves.

Since the start of the century, social media networks have slowly invaded human lives that we have become dependent on it. Given the increasing dependence of digital lives on social media networks, the regulation of the content should be social media network's social responsibility. A similar position was taken by the US supreme court that social media networks would be required to regulate their content (Cusumano, Yoffie, & Gawer, Pushing Social Media Platforms to Self-Regulate, 2022). Similarly, Pakistan's 3rd and the most recent social media rules titled the "Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards) Rules, 2021" also emphasized in Article 8 that social media networks should self-regulate their content. For the purpose, social media networks should make the community guidelines accessible. The 3rd set of rules also mentioned the expectations of the community guidelines of the social media networks and stated that the social media networks should not transmit content that was in violation of the local laws. In this regard, social media network shave revised their community guidelines. For instance, Facebook upgraded from an initially 'thin self-regulation' to 'enhanced self-regulations' (Medzini, 2021). Despite the efforts by social media networks to regulate the contents, the task remains daunting one (Alkiviadou, 2018). These efforts are weak due to certain loop holes discussed subsequently;

- 1. Firstly, **businesses**: the social media networks are businesses aiming to increase profit(Leetaru, 2018). They view the content regulation from a profit loss perspective.
- 2. Secondly, **community guidelines:** social media networks are only digital platforms and not the experts of regulations. Their community guidelines are only codes of conduct or decisions regarding the approximate online content(Milosavljević & Micova, 2016).
- 3. Thirdly, **digital divide:** there is a significant digital divide that exists between the north and the south(Ali, 2011). Since the social media networks are businesses of the countries in the North, they hold more authority to take actions against them.
- 4. Fourthly, digitalization: due to the surge of digitalization and lack of binding regulations, social media **networks** have been overwhelmed. During pandemic, for instance, the increased use of social media networks saw a proliferation of misinformation regarding the pandemic also quoted as 'infodemic' by the World Health Organization(World Health Organization, 2020).
- 5. Fifthly, biases: there is an evident bias exhibited by the social media **networks** that favor the stance of one community, faith or cause over the other. For example, during Israel Palestine conflict, the Facebook and Twitter algorithms were removing the pro-Palestinian posts while the Israeli Defense Forces were active on social media(**Farzan, 2021**).

Due to the above-mentioned reasons, there could a lack of a self-regulatory mechanism within social media that would be able to address issues unique to Pakistan. Although the demand by the government for social media networks to regulate their deficiencies would continue,

Government of Pakistan cannot overlook regulating social media within its boundaries at this time and age. For the purpose of regulating, it could be challenging for Pakistan to develop and implement a comprehensive social media policy. If comprehensive government-framed social media regulation path is to be adopted by the Government of Pakistan and Pakistan Telecommunication Authority, then the above-mentioned aspects would need to be addressed. To analyse the proposed social media rules by the Government of Pakistan based on the above-mentioned aspects, keeping in mind Pakistan's limited influence over social media networks, it is uncertain how the present rules of social media would be able to alter the business model of social media networks. Furthermore, due to biases and the digital divide it is unclear how the sensitive subjects to Pakistan would be able to make room and have an influence on social media networks.

Limited Government-Framed Regulations for Pakistan

Keeping the above discussion insight, it is recommended that Pakistan adopts social media rules that are based on targeted issues to address the vulnerabilities social media exposes to Pakistan in specific. An adaptable model for social media regulations for Pakistan could fall under the category of limited government-framed regulations. The presently recommended social media rules barely fall under the category of limited government-framed regulations as they have a broad spectrum and demand structural changes. The matter of present rules being broad in scope and demanding structural changes is analysed below before recommending a strategy to develop "limited social media regulations".

Firstly, the title "the Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards) Rules, 2021" was generic rather than specific and beyond the scope of Pakistan's influence. It was unclear if removal and blocking of the content from the entire website would be possible. Pakistan did not have enough influence to issue the statement of removal or blocking of the content from social media networks worldwide. On a number of occasions PTA probed Facebook

to remove the posts that violated the Prevention of Electronic Crimes Act, 2016 (PECA), however, Facebook reported since it did not violate the community guidelines it would not remove the posts from Facebook. Following an assessment of these incidents, in accordance with the local laws by Facebook, the posts were only restricted in Pakistan but accessible around the world(Jahangir, 2020). This would simply block the content from Pakistan which is only a partial solution to the problem. Therefore, the title of the rules should not state blocking or removing, as technically, the unlawful content is still present on the social media networks and accessible worldwide for manipulation. Furthermore, within the title, it is unclear what constitutes unlawful. This becomes tricky to assess which unlawful aspects are being targeted under these rules.

Secondly, chapter 2 of 3rd set of "the Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards) Rules, 2021" was titled "safeguarding the freedom of speech and expression." This seemed antithesis to the title of the rules. If social media rules were developed for the purpose of blocking the content, it seemed unreasonable to place freedom of speech and expression as opening remarks. The 1st set of social media rules did not mention of freedom of speech and expression. It was only in 2nd set of social media rules that this chapter was introduced as part of the rules after receiving criticism. The criticism stated that the first social media rules violate Article 19 of Pakistan that granted freedom of speech and expression to its citizens(Article 19, 2020). However, placing freedom of speech and expression as a chapter was not a guarantee of freedom of expression. Even after the 2nd and 3rd rules, when the chapter of freedom of expression was placed in the rules, Pakistan was criticized for the lack of freedom of expression and it was highlighted by the 2021 World Press Freedom Index Pakistan that Pakistan ranked 145 out of 180(Reporters Without Borders, 2021). This showed that the criticism regarding freedom of expression would not eliminate unless society evolved and started making criticism a way to ensure accountability and address grievances. Nevertheless, oftentimes

under the notion of freedom of expression, hybrid warfare and mischievous attempts were made by foe states against Pakistan to spread misinformation and disinformation in order to infiltrate chaos and violence. Such attempts need attention not only by PTA but also by the international bodies as witnessed in the case of Indian Chronicles by EU Disinfo Lab(Alaphilippe, Adamczyk, & Grégoire, 2020).

Thirdly, the social media rules had vague definitions and targets. For instance, the 2nd set of social media rules "the Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards), Rules 2020" discussed aspects that needed separate attention such as privacy, data protection, extremism, defense and security, hate speech and so on. Taking one aspect at a time, for instance, the matter of privacy and data protection had been a rising concern at national and international levels and states and international bodies have published their regulations on this matter. In 2018 the European Union implemented General Data Protection Regulation (GDPR)(European Union, 2016) with the aim to target protection and data privacy and harmonize data privacy laws across Europe. This policy, although had loopholes in the implementation phase, increased awareness regarding a targeted subject of data protection. States and companies likewise have taken measures to adopt these rules(Massé, 2021). Pakistan has taken such issue targeted measures to counter ills in past. For instance, after the APS attack of 2014, the government of Pakistan took issue targeted measures to counter-terrorism in Pakistan. Under these measures "Prevention of Electronic Crimes Act (PECA)" was enacted by the National Assembly to eliminate terrorism and militancy in Pakistan(Khan, 2018). Although reported by Institute for Research, Advocacy and Development that PECA had curbed the speech and not the crime(Dawn, 2022), it had issue-targeted aim and objective. Therefore, if social media rules were to be developed by the government of Pakistan, the rules must have a limited, targeted and focused aim that it would address rather than publishing rules with a broad scope.

Fourthly, the social media rules demanded that the social media networks register with authorities in Pakistan, establish offices with physical address and appoint an authorized compliance officer based in Pakistan. These demands were, although genuine, made with strict tone and timelines. Such as the time allotted to register is within 3 months of the rules being enforced. The offices are said to open within 9 months according to 2nd set of social media rules, however, after push back on this, the latest 3rd set of rules mentioned of the opening of offices 'as and when feasible'. After these rules, the social media networks threatened to leave Pakistan(Jahangir, Tech giants threaten to leave Pakistan if social media rules stay, 2020). It must be kept in mind that social media

networks would need a conducive business environment to open offices in Pakistan rather than by orders. Moreover, social media networks must be invited to open their offices. The invitation could be based on a number of reasons that make Pakistan eligible for business such as its growing number of internet users, entrepreneurship environment and unsaturated business opportunities. According to Digital 2021, there are about 61.34 million(Kemp, 2021) internet users in Pakistan which is more than France at 60 million users(Johnson, 2021). Furthermore, according to McKinsey & Company, entrepreneurship in Pakistan was emerging to satisfy the unmet demands(Bokhari & Syed, 2019). This shows the potential in Pakistan which could form the basis of invitation

The above-mentioned reasons could be a few due to which the 3rd set of proposal social media rules did not leave a positive impact. As the development of social media rules for Pakistan is an on-going process, following approach could be looked into. It is a revised approach towards developing issue targeted and focused social media rules that would need to be enacted. The following recommendations propose how 'limited government-framed regulations' can be developed.

Recommendations

to the social media giants.

The following recommendations could be made in order to develop the regulations of social media in Pakistan.



Framework for developing social media regulations in Pakistan

- Scan the threat digital threat landscape: If the digital environment of Pakistan is examined, it is amassed with a number of issues that need attention. In order to identify targets that needs attention, a through brainstorming scan of the digital threat landscape is be needed. For instance, there is a rise of cases of religious discrimination, sectarianism, minority issues, and so on. Identify the issues that are most to least daunting for the digital environment of Pakistan.
- **Define a targeted issue:** The issues identified above; religious discrimination, sectarianism, minority issues can be clubbed under the matter of hate speech. Hate speech according to the Oxford dictionary is defined as "abusive or threatening speech or writing that expresses prejudice against a particular group". There is no agreeable international legal definition of hate speech and what constitutes hateful varies from individual to society. This is where the biases and digital divide factor steps due to which unique issues of hate speech are left unaddressed by the social media networks. In order to develop rules to address hate speech online, in the context of Pakistani society, the Government of Pakistan can develop a definition of hate speech that addresses issues specific to its country. Guidance on the matter can be sought from social media's self-regulatory policy on hate speech. Within the social media hate speech policies, identify what those definitions include as hate speech,

and what is missed out that can be added to make Pakistan's hate speech online rules.

- **Pragmatic approach:** Once the definition of hate speech is identified, realistic and attainable rules can be drafted. For instance, the title of such a policy could be along the lines of "Policy of Hate Speech Online." Under this title, a realistic approach is highlighted which is within the scope of Pakistan's influence over social media networks. Furthermore, the demand to register and open offices, as discussed in social media rules, could be made with incentives such as business scope for the companies to open offices. These could constitute a realistic and attainable approach.
- Issue focused target and vision: The content of the policy would need to have focused issue that it would address, such as for the sake of discussion the matter of hate speech is taken, and vision that it would attain by a certain time. These targeted contents of rules can be identified utilizing the research conducted to define hate speech in Pakistan. The targeted issues can also be identified by analysing the most commonly occurring of hate speech online and what sort of influence does it leave on the society. Does hate speech incite physical violence and chaos within society? Does the hate speech have a spill-over effect on other domains? Such a matrix can be drawn to identify the targeted issues. While the vision could be to reduce the hate speech online by a certain percentage in given a time period. Lastly, it would also be important to analyse the effectiveness and progress periodically.
- Consult the stakeholders: For the purpose of developing the policy against hate speech online various stakeholders such as victims of hate speech, assaulters, internet service providers, think tanks, social media companies, civil society, academia, influencers, and so on would need to be involved. The purpose of stakeholders would not be to draft the regulations but for the purpose of conveying the problems and recommending

- attainable solutions. This would also ensure transparency and responsibility. The stakeholders would need to remain involved in drafting the rules as they would also be the voices of the rules online in order to spread awareness regarding the subject.
- Address root cause through social media: Lastly, for the purpose of achieving the objective of addressing hate speech online, it would be important that the root cause, actors and drivers of hate speech are addressed outside of digital sphere. An ideal platform to counter hate speech would be social media which is used as a tool to spread hate speech. Additionally, this could be done through education, awareness campaigns, engaging electronic and press media and so on(United Nations, 2020). This effort would also need attention to relevant subjects such as the matter of acceptance. Presently, the level of acceptance remains low in society which is why incidents of blasphemy takes. If these recommendations are looked into thoroughly, the hate speech online could be addressed.

Conclusion

Social media is a toolkit for socialization, however, due to misuse of social media by state and non-state actors alike, social media has become a toolkit for manipulation. As the influence of social media is growing, it is becoming important that measures are taken to regulate social media. Social media networks have themselves taken the responsibility to regulate their platforms. In addition, number of measures are taken by states to address the adverse effects of social media. All these measures can be discussed under three frameworks, self-regulation of social media by social media networks, limited government-framed regulations and comprehensive government-framed regulations for social media.

Self-regulations are practices, guidelines and measures taken by the social media companies to address shortcomings. Limited social media regulations follow a targeted approach with a limited need to structurally

change the business and algorithmic model social media networks. While a comprehensive social media regulation follows a broad approach that introduces novel regulation and demand structural and algorithmic change of social media models. Ideally, the social media networks should be well equipped and more capable to regulate social media and it should not be the worry of governments to influence social media networks to be responsible towards their users. However, with the increase in digitalization, the social media networks have been unable to regulate their platforms. This inability to regulate as has been due to limited interest of social media networks in regulating the content. This stems from the matter that social media networks are businesses and for this reason they follow their own community standards and guidelines keeping the loss profit in preview. Additionally, there is a visible digital divide between the north and south countries and due to this there are biases within the content is filtered on social media.

Due to these reasons, an approach Pakistan can follow is limited and issue targeted social media regulations. Pakistan has followed this approach under PECA before that had a targeted aim of curtailing online crimes. Presently, the government of Pakistan has also attempted to draft social media rules, however, the rules have broad approach under the title "the Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards) Rules, 2021". These rules would be difficult to implement as they fail to define unlawful content yet it mentions of granting freedom of expression. One will have to read between the lines to understand the rules. Furthermore, due to limited influence on social media networks, the removal and blocking of content has not been possible in the past and the future remains uncertain. The rules have vague definitions and targets. And lastly, the social media rules present unrealistic demands. Therefore, Pakistan would need to develop social media rules that are focused and targeted and aimed at achieving a desired objective. For the purpose of developing social media rules, the government of Pakistan will need to scan the digital threat landscape, define a targeted issue, develop a pragmatic approach, form a focused

target and vision, consult the stakeholders and most importantly address the root cause through social media. This approach could be useful in eliminating targeted social media ills and mitigating its symptoms. **Bibliography**

- Kapoor, K. K., Tamilmani, K., Rana, N. P., Patil, P., Dwivedi, Y. K., & Nerur, S. (2018). Advances in Social Media Research: Past, Present and Future. Information Systems Frontiers, 531-558.
- Aisa Internet Coalition. (2020, Nov 19). [Pakistan] AIC Issues Media Statement on New Internet Rules (20 Nov 2020). Retrieved Jan 25, 2022, from https://aicasia.org/2020/11/20/pakistan-aic-issues-mediastatement-on-new-internet-rules-20-nov-2020/
- Alaphilippe, G. M., Adamczyk, R., & Grégoire, A. (2020, Dec 9). Indian Chronicles: Deep Dive into a 15 Year Operation Targeting the EU and UN to Serve Indian Interets. Retrieved Jan 25, 2022, from EU Disinfo Lab: https://www.disinfo.eu/publications/indian-chronicles-deep-dive-into-a-15-year-operation-targeting-the-eu-and-un-to-serve-indian-interests/
- Ali, A. H. (2011). The Power of Social Media in Developing Nations: New Tools for Closing the Global Digital Divide and Beyond. Harvard Human Rights Journal, 185-219.
- Alkiviadou, N. (2018). Hate speech on social media networks: towards a regulatory framework? Information & Communications Technology Law, 19-35.
- Article 19. (2020, Aug 13). Pakistan: Online Harms Rules violate freedom of expression. Retrieved Jan 25, 2022, from https://www.article19.org/resources/pakistan-online-harms-rules/

- Arun, C. (2020, May 6). The Facebook Oversight Board: An Experiment in Self-Regulation. Retrieved Jan 25, 2022, from Just Security: https://www.justsecurity.org/70021/the-facebookoversight-board-an-experiment-in-self-regulation/
- Bokhari, A., & Syed, A.-R. (2019, April 15). Starting up: Unlocking entrepreneurship in Pakistan How Pakistan can support the startup ecosystem to encourage the emergence of local technology companies. Retrieved Jan 25, 2022, from McKinsey & Company: https://www.mckinsey.com/~/media/mckinsey/featured% 20insig hts/middle% 20east% 20and% 20africa/pakistans% 20start% 20up% 20landscape% 20three% 20ways% 20to% 20energize% 20entrepreneurship/starting-up-unlocking-entrepreneurship-in-pakistan.ashx
- Botero-Marino, C., Greene, J., McConnell, M. W., & Thorning-Schmidt, H. (2020, May 6). We Are a New Board Overseeing Facebook. Here's What We'll Decide. Retrieved Jan 25, 2022, from The New York Times: https://www.nytimes.com/2020/05/06/opinion/facebook-oversight-board.html?smid=tw-nytopinion&smtyp=cur
- Bradshaw, S., Bailey, H., & Howard, N. P. (2021). ndustrialized Disinformation: 2020 Global Inventory of Organized Social Media Manipulation. Oxford, UK: Programme on Democracy & Technology.
- Byman, D. L. (2022, Jan 20). How Middle Eastern conflicts are playing out on social media. Retrieved Jan 25, 2022, from Brookings: https://www.brookings.edu/blog/order-from-chaos/2022/01/20/how-middle-eastern-conflicts-are-playing-out-on-social-media/
- Ceci, L. (2021, Dec 7). Number of videos removed from YouTube worldwide from 4th quarter 2017 to 3rd quarter 2021.

Retrieved Jan 25, 2022, from Statista: https://www.statista.com/statistics/1132890/number-removed-youtube-videos-worldwide/

- Chant, T. D. (2021, May 14). Five new bills aim to break up Big
 Tech platforms, force them to play nice. Retrieved Jan 25, 2022,
 from Ars Technica: https://arstechnica.com/techpolicy/2021/06/five-new-bills-aim-to-break-up-big-techplatforms-force-them-to-play-nice/
- Cusumano, M. A., Gawer, A., & Yoffie, D. B. (2021, Jan 15).
 Social Media Companies Should Self-Regulate. Now. Retrieved Jan 25, 2022, from Harvard Business Review: https://hbr.org/2021/01/social-media-companies-should-self-regulate-now
- Cusumano, M. A., Yoffie, D. B., & Gawer, A. (2022, Jan 3).
 Pushing Social Media Platforms to Self-Regulate. Retrieved Jan 25, 2022, from The Regulatory Review: https://www.theregreview.org/2022/01/03/cusumano-yoffiegawer-pushing-social-media-self-regulate/
- Dawn. (2022, Jan 14). Rights activists seek reform in cybercrime law. Retrieved Jan 25, 2022, from https://www.dawn.com/news/1669283
- Digital Rights Foundation. (2020, Nov 30). Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards) Rules, 2020: Legal Analysis. Retrieved Jan 25, 2022, from Digital Rights Foundation: https://digitalrightsfoundation.pk/wpcontent/uploads/2020/12/Removal-and-Blocking-of-Unlawful-Online-Content-Procedure-Oversight-and-Safeguards-Rules-2020_-Legal-Analysis.pdf

- European Union. (2016). General Data Protection Regulation GDPR. Retrieved Jan 25, 2022, from Intersoft Consulting: https://gdpr-info.eu
- Geo News. (2020, Nov 20). Critics cry foul over govt's sweeping rules to control social media. Retrieved Jan 25, 2022, from Geo News: https://www.geo.tv/latest/319520-rbuoc
- Government of Pakistan. (2020, Jan 21). Citizens Protection (Against Online Harm) Rules 2020. Retrieved Jan 25, 2022, from Ministry of Information Technology and Telecommunication: https://moitt.gov.pk/SiteImage/Misc/files/CP%20(Against%20Online%20Harm)%20Rules%2C%202020.pdf
- Government of Pakistan. (2021, Sept 2022). The Removal and Blocking of Unlawful Online Content (Procedure, Oversight and Safeguards) Rules, 2021. Retrieved 25 Jan, from https://moitt.gov.pk/SiteImage/Misc/files/Final%20Draft%20Rules%20-%20RULES%20FOR%20REMOVAL%20AND%20BLOCKING%20OF%20UNLAWFUL%20ONLINE%20CONTENT%20(PROCEDURE%2C%20OVERSIGHT%2C%20AND%20SAFEGUARDS)%20RULES%2C%202020.pdf
- Hasan, D. M. (2021, Sept 30). Social media regulation will curb political dissent. Retrieved Jan 25, 2022, from Human Rights Commission of Pakistan: http://hrcp-web.org/hrcpweb/social-media-regulation-will-curb-political-dissent/

- Jahangir, R. (2020, May 13). Pakistan among countries with most content removal requests: Facebook. Retrieved Jan 25, 2022, from Dawn: https://www.dawn.com/news/1556715
- Jahangir, R. (2020, Nov 20). Tech giants threaten to leave Pakistan if social media rules stay. Retrieved Jan 25, 2022, from Dawn: https://www.dawn.com/news/1591357
- Jahangir, R. (2020, Nov 20). Tech giants threaten to leave Pakistan if social media rules stay. Retrieved Jan 25, 2022, from Dawn: https://www.dawn.com/news/1591357
- Johnson, J. (2021, July 19). Countries with the highest number of internet users 2021. Retrieved Jan 25, 2022, from Statista: https://www.statista.com/statistics/262966/number-of-internetusers-in-selected-countries/
- Karanicolas, M. (2020, Feb 29). Newly Published Citizens
 Protection (Against Online Harm) Rules are a Disaster for
 Freedom of Expression in Pakistan. Retrieved Jan 25, 2022, from
 Information Society Project Yale Law School:
 https://law.yale.edu/isp/initiatives/wikimedia-initiativeintermediaries-and-information/wiii-blog/newly-publishedcitizens-protection-against-online-harm-rules-are-disasterfreedom-expression
- Kemp, S. (2021, Feb 11). Digital 2021: Pakistan. Retrieved Jan 25, 2022, from Datareportal: https://datareportal.com/reports/digital-2021-pakistan
- Khan, E. A. (2018). The Prevention of Electronic Crimes Act 2016: An Analysis. LUMS Law Journal.
- Khilji, U. (2020, Nov 22). Draconian internet rules. Retrieved Jan 25, 2022, from Dawn: https://www.dawn.com/news/1591732

- Lau, T. (2020, Jan 17). The Honest Ads Act Explained. Retrieved Jan 25, 2022, from Brennab Center For Justice: https://www.brennancenter.org/our-work/research-reports/honest-ads-act-explained
- Leetaru, K. (2018, Dec 15). What Does It Mean For Social Media Platforms To "Sell" Our Data? Retrieved Jan 25, 2022, from Forbes: https://www.forbes.com/sites/kalevleetaru/2018/12/15/whatdoes-it-mean-for-social-media-platforms-to-sell-ourdata/?sh=2b3389852d6c
- Machado, G., Alaphilippe, A., Adamczyk, R., & Grégoire, A. (2020, Dec 9). Indian Chronicles. Retrieved Jan 25, 2022, from Disinfo Lab: https://www.disinfo.eu/wp-content/uploads/2020/12/Indian-chronicles_SUMMARY.pdf
- Massé, E. (2021). Three Years Under The EU GDPR: An Implementation Progress Report. Acess Now.
- Medzini, R. (2021). Enhanced self-regulation: The case of Facebook's content governance. New Media & Society.
- Milosavljević, M., & Micova, S. B. (2016). Banning, Blocking and Boosting: Twitter's Solo-Regulation of Expression. Medijske Studije, 43-58.
- Nachiappan, K. (2020, March 4). Regulating Cyberspace: Pakistan's New Social Media Rules. Retrieved Jan 25, 2022, from Institute of South Asian Studies: https://www.isas.nus.edu.sg/papers/regulating-cyberspace-pakistans-new-social-media-rules/
- National Institute of Justice. (2017). The Role of Social Media in the Evolution of Al-Qaeda Inspired Terrorism. Washington, DC: US Department of Justice.

- PwC. (2021). General Data Protection Regulations. Retrieved Jan 25, 2022, from PwC: https://www.pwc.com/mu/en/services/advisory/consulting/cybers ecurity/general-data-protection-regulations.html
- Reporters Without Borders. (2021). 2021 World Press Freedom Index. Retrieved Jan 25, 2022, from https://rsf.org/en/ranking
- Reporters Without Borders. (2021, Nov 21). Another attempt by Pakistan's government to censor social media. Retrieved Jan 25, 2022, from https://rsf.org/en/news/another-attempt-pakistans-government-censor-social-media
- Reuters. (2020, July 8). Germany Insists Self-Regulation Not Enough for Facebook. Retrieved Jan 25, 2022, from Voice of America: https://www.voanews.com/a/europe_germany-insists-self-regulation-not-enough-facebook/6192417.html
- Romm, T., & Dwoskin, E. (2021, Jan 11). Twitter purged more than 70,000 accounts affiliated with QAnon following Capitol riot. Retrieved Jan 25, 2022, from The Washington Post: https://www.washingtonpost.com/technology/2021/01/11/trumptwitter-ban/
- Samples, J. (2019, April 9). Why the Government Should Not Regulate Content Moderation of Social Media. Retrieved Jan 28, 2022, from CATO Institute: https://www.cato.org/policyanalysis/why-government-should-not-regulate-contentmoderation-social-media
- Shafeeq, M. (2021, June 24). Militarisation of Social Media: A
 New Threat to National Security? Retrieved Jan 25, 2022, from
 Centre for Aerospace & Security Studies (CASS):
 https://casstt.com/post/militarisation-of-social-media-a-newthreat-to-national-security/383

- Stening, T. (2021, Oct 5). How Should Facebook Be Regulated?
 Why Political Solutions WIll be Hard to Achieve. Retrieved Jan 25, 2022, from Northeastern University: https://news.northeastern.edu/2021/10/05/how-should-facebook-be-regulated/
- The News International. (2021, Oct 15). Govt issues rules for removal, blocking of unlawful online content. Retrieved Jan 25, 2022, from The News International: https://www.thenews.com.pk/print/900332-govt-issues-rules-for-removal-blocking-of-unlawful-online-content
- Times of Pakistan. (2021, Oct 15). Pakistan's new social media rules explained. Retrieved Jan 25, 2022, from https://timesofpakistan.pk/pakistan/2021/10/15/pakistans-social-media-rules/113908/
- United Nations. (2020). United Nations Strategy and Plan of Action on Hate Speech. Retrieved Jan 25, 2022, from https://www.un.org/en/genocideprevention/hate-speechstrategy.shtml
- Ward, A. (2018). ISIS's Use of Social Media Still Poses a Threat to Stability in the Middle East and Africa. Santa Monica: RAND.
- Weimann, G. (2016). The Emerging Role of Social Media in the Recruitment of Foreign Fighters. In A. d. Guttry, F. Capone, & C. Paulussen, Foreign Fighters under International Law and Beyond. The Hauge: Asser Press.
- Wolford, B. (2020). What is GDPR, the EU's new data protection law. Retrieved Jan 25, 2022, from GDPR EU: https://gdpr.eu/what-is-gdpr/
- Wong, J. C. (2019, March 18). The Cambridge Analytica scandal changed the world but it didn't change Facebook. Retrieved Jan

 $25, \qquad 2022, \qquad from \qquad The \qquad Gaurdian: $$ https://www.theguardian.com/technology/2019/mar/17/the-cambridge-analytica-scandal-changed-the-world-but-it-didnt-change-facebook$

 World Health Organization. (2020). Infodemic. Retrieved Jan 25, 2022, from https://www.who.int/healthtopics/infodemic#tab=tab_1