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**Free Speech vs. Information Control: A Comparative Analysis of Government
Responses to Misinformation in Crises**

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Introduction

Situational Crisis Communication Theory (SCCT) has become increasingly important in modern debates on political communication and crisis management since it helps one to comprehend how institutions react under pressure. Effective crisis communication, according to Coombs (2007), depends on trust, speed, and transparency, three factors that can influence not only public opinion but also the real efficacy of a government's crisis reaction. Transparency fosters long-term credibility; speed helps stop panic and the spread of rumors; and trust shapes how people understand official actions (Pei, 2023; Ott & Hoelscher, 2023). Recent studies confirm these observations: public behavior and cooperation can be greatly influenced by how governments handle information during crises (Mirzoyan, 2023).

Digital communication has simultaneously complicated the picture. The conflict between government control and freedom of expression has become more evident as knowledge moves more freely over borders and platforms. Though proponents of open communication like John Stuart Mill have long argued for its support of truth and democracy, modern issues including online hate speech, fake news, and conspiracy theories have pushed even democratic governments to take more forceful action. Authoritarian governments, meanwhile, sometimes justify their tight control over information by citing crises. The idea of the "state of exception" by Giorgio Agamben clarifies how governments, under crisis, might increase their authority and limit civil liberties (Keremoğlu & Weidmann, 2020; Munoriyarwa, 2022). Under such circumstances, handling a crisis may serve as cover for supporting totalitarian policies.

This problem especially becomes clear in the field of digital governance. Platforms like Facebook and Twitter help to moderate content, as Gillespie points out, but they do it in often opaque, inconsistent, and national law-influenced ways. Nations like China increasingly apply digital tools not only for communication but also for ideological control and surveillance (Ibrahim, 2024). Scholars characterize these developments as the emergence of digital authoritarianism, a model whereby technology enhances the state's capacity to monitor, censor, and direct public debate (Luo & Li, 2022; Dal et al., 2022). Governments are struggling with how to control platforms without compromising democratic norms, even in hybrid or democratic systems.

Comparatively speaking, regime type is significant in determining how citizens react and how information is handled. Scholars including Diamond, Levitsky, and Way contend that authoritarian governments frequently restrict media freedom, thereby lowering public confidence and limiting civic participation (Schlumberger et al., 2023). On the other hand, especially when false information compromises public safety, democracies must balance openness with security. These conflicts are simply getting more intense as digital infrastructure takes the front stage in political life (Hellmeier, 2016; Salem, 2016). Building on these observations, this thesis compares the responses of Germany, India, and China to false information during the COVID-19 epidemic to underline how political systems shape the instruments governments choose to control narratives, manage public trust, and defend democratic values.

Chapter 1: Crisis Communication, Information Disorders, and Theoretical Framework

1.1 Introduction

Theoretically and conceptually, this chapter lays the foundation of the thesis. It examines how governments manage false information during crises, with particular attention to digital governance, crisis communication strategies, and the control of information flows. Drawing on key scholarly theories and recent research, the chapter explores the intersection of political regime types, public health communication, and freedom of expression. The aim is to establish a framework that guides the subsequent analysis of Germany, India, and China's responses to the COVID-19 infodemic. The chapter is organized into five sections: key definitions, crisis communication theory, information disorders, regime typologies, and the political implications of information control.

1.2 Key Concepts and Definitions

To maintain conceptual coherence and clarity, this section defines the key concepts used throughout the thesis. It forms the basis for the theoretical discussion and comparative analysis that follow.

Crisis communication refers to the strategies and procedures employed by governments, institutions, or organizations to disseminate timely, accurate, and reliable information during emergencies. Its main objectives are to reduce uncertainty, guide public behavior, and maintain confidence in official sources (Coombs, 2007; Pei, 2023). Managing the flow of information becomes especially challenging during fast-moving crises such as the COVID-19 pandemic, where multiple forms of misleading content emerge simultaneously.

Misinformation is inaccurate or misleading information shared without intent to cause harm, often resulting from misunderstandings, lack of verification, or insufficient fact-checking (Varga & Jacobsen, 2020). Disinformation, in contrast, is deliberately false or manipulated information spread with the intent to mislead, typically for political, ideological, or financial purposes

(Dharawat et al., 2022). Malinformation refers to factual information used in a way that causes harm or misleads, such as revealing private details or presenting facts selectively to stigmatize or distort perceptions (Chen et al., 2021).

The World Health Organization defines an *infodemic* as an overabundance of both accurate and inaccurate information that spreads rapidly during a crisis, making it difficult for the public to identify trustworthy sources and respond appropriately. This phenomenon is driven by the accelerated spread of all forms of false or distorted content, especially in digital spaces (Lohiniva et al., 2022).

Understanding these overlapping yet distinct concepts is essential for analyzing how different political regimes address information challenges during times of crisis.

1.3 Information Disorders and Democratic Resilience

In today's technologically advanced societies, information disorders which include misinformation, disinformation, and malinformation represent a serious and complex crisis that was significantly exacerbated during the COVID-19 pandemic. These disorders contribute to ineffective public health responses and jeopardize the stability of democratic systems by impeding effective communication, causing panic in society, and undermining institutional trust. Information disorders are no longer secondary phenomena; rather, they have developed into independent crises that require careful examination and strong policy responses.

Public health, social cohesiveness, and democratic legitimacy are all significantly impacted by misinformation, which is inaccurate or misleading information disseminated without malicious intent, and disinformation, which is purposefully created or altered content intended to deceive. This situation is made more difficult by malinformation, which is actual information that has been misused to harm others by obfuscating the distinction between fact and distortion. These effects are made worse and have serious societal ramifications due to the shift in information dynamics during crises, especially the increase in digital communication and the spread of content across platforms. According to Martínez-García and Ferrer (2023), the quick development of digital communication platforms has significantly changed the way that information is created and shared. This change has made it possible for a range of actors

including private citizens, interest groups, and even governmental organizations to spread misleading or deceptive information at a never-before-seen scale and velocity. Such patterns can cause confusion, erode public trust in trustworthy sources, and impede institutional responses in times of crisis, as Le & Nguyen (2021) show.

These dynamics came into stark focus during the COVID-19 pandemic. The term "infodemic" was created by the World Health Organization to characterize the proliferation of information during the crisis, both accurate and inaccurate. In addition to making it more difficult for the public to identify trustworthy advice, this information overload significantly contributed to the rise in mistrust, polarization, and anxiety. According to Le and Nguyen (2021), the psychological stress brought on by the pervasive false information on social media is one factor contributing to the pandemic's correlation with an increase in mental health conditions like anxiety and depression. Sahu et al. (2024) also stress that people with serious mental health issues are more vulnerable to information disorders, which makes it harder for them to critically assess claims.

The influence of disinformation on public health practices has been significant. Inaccurate statements regarding the nature of the virus, vaccine safety, and treatment options caused misunderstandings and opposition to public health recommendations, which postponed interventions and decreased vaccination rates. These claims are widely supported in the literature, despite the fact that the original segment lacked specific citations to quantify these outcomes. Pickles et al. (2020) support this by demonstrating how false information spread during the pandemic caused public trust in health advice to decline and compliance to become more difficult, both of which had a major impact on health outcomes.

The wider effects of information disorders on democratic institutions are extremely worrisome, going beyond personal and societal health. According to Mont'Alverne et al. (2024), electoral disinformation undermines public confidence in the legitimacy of democratic processes, which may lead to disengagement from civic life or incite violence against electoral bodies. Such occurrences reflect a crisis of legitimacy as well as a crisis of information. Politically motivated disinformation campaigns are frequently employed to influence public opinion or undermine

political opponents. Democratic principles like accountability, transparency, and informed consent are compromised by this manipulation of the information space.

In democracies, the dynamics of trust are also significantly impacted. According to Ognyanova et al. (2020), exposure to fake news reinforces partisan biases and lowers trust in government agencies and mainstream media. Political polarization increases and the public sphere breaks apart when people place their trust in sources that share their beliefs, regardless of how accurate the information may be. These consequences undermine the legitimacy of democratic governance and lower the standard of discussion that is necessary for democratic engagement.

In support of this, Aryana et al. (2024) point out that the proliferation of false information impedes effective crisis management techniques and leads to organizational dysfunction. Long-term systemic vulnerabilities brought on by the breakdown of social trust are hard to fix. Society is more vulnerable to manipulation and effective collective responses to crises, whether political or health-related, are compromised when trust in institutions is lost.

According to academics like Stepanova & Roß (2023), disinformation is framed as a type of "cyber-enabled information warfare," highlighting its capacity to fundamentally undermine democracy and public discourse. Widespread disinformation has structural repercussions that impact the very institutions and standards that support democratic life, making them more than just informational. These disorders have such widespread systemic effects that they can be compared to global threats like nuclear proliferation or climate change, highlighting their relevance in the modern era.

Leonardo Morlino's work is especially instructive in this regard. In *Changes for Democracy* (2011), Morlino makes the case that a democracy's quality is contingent upon a number of factors, including the availability of accurate and easily accessible information, the capacity of citizens to participate in meaningful deliberation, and electoral competition and institutional integrity. Civil liberties, democratic accountability, and participation are seriously jeopardized when the information landscape is overrun with false narratives or when the truth itself is politicized.

Finally, the danger of information disorders is not the same for all regimes. These disorders put pluralism's tenacity and institutions' capacity to dispel lies without using force to the test in democracies. The prevalence of false information, on the other hand, may be used by authoritarian and hybrid governments as an excuse for censorship, stifling dissent and strengthening their hold on power. Therefore, the study of information disorders is essential to understanding the larger trends of authoritarian consolidation and democratic erosion in the digital age, as well as to public health and media studies.

In summary, the emergence of information disorders warrants consideration as a unique and complex crisis, particularly in crisis situations like the COVID-19 pandemic. Their influence extends to institutional legitimacy, psychological health, public health, and democratic resilience. Coordinated responses are needed to address these issues, including media literacy programs, accurate information distribution, open communication from institutions, and cross-sector initiatives to restore public confidence. Democracies can only address the epistemic crises endangering both individual welfare and collective governance by adopting such comprehensive approaches.

1.4 The COVID-19 Infodemic: Scope and Impact

In addition to creating significant public health issues, the COVID-19 pandemic has sparked a global spread of false information known as an "infodemic," according to the World Health Organization (WHO). This phrase refers to an excess of information, both true and false, that spreads quickly during medical emergencies, making it more difficult for the public to understand and undermining efforts to respond to crises.

In the past, damaging false information has influenced health emergencies like the HIV/AIDS pandemic and impeded public health efforts. Similar dynamics resurfaced during COVID-19, according to Evanega et al. (2020), with misinformation reaching previously unheard-of levels and escalating public noncompliance, confusion, and mistrust. Furthermore, Sun et al. (2024) stress that the spread of misleading information increased institutional skepticism and public anxiety while undermining the efficacy of public health initiatives.

One of the main ways that this infodemic spread was through social media. According to Kouzy et al. (2020), a "tsunami of information" overtook social media sites like Facebook and Twitter, overwhelming users and clouding their judgment of reliable sources. A systematic review by Gabarrón et al. (2021) verified that dangerous behaviors were influenced by widely shared misleading content on social media, while Lieneck et al. (2022) observed that algorithmic echo chambers exacerbated misinformation, reducing the effectiveness of fact-checking and public health messaging. Additionally, Tsao et al. (2021) noted that current platform policies were inadequate to combat this flood of false narratives, urging immediate innovation in media literacy initiatives and content moderation.

Misinformation has an impact on larger political dynamics in addition to individual behavior. According to Roozenbeek et al. (2020), there is a latent vulnerability in global health communication because even though most people do not fully support false claims, many still find certain misinformation plausible. This vulnerability makes it more difficult to contain outbreaks and erodes public confidence in healthcare organizations. The emotional toll of the infodemic was demonstrated by Hassan and Sabry (2023), who connected exposure to false information with increased stress, anxiety, and decreased adherence to preventive measures.

These difficulties were made worse by political polarization. In their analysis of pandemic responses in politically divided societies, Kerr et al. (2021) demonstrated that partisan differences exacerbated vaccine skepticism and postponed effective responses. In line with this worry, White et al. (2023) showed that ideological polarization frequently determines whether people accept scientific evidence or reject it as propaganda, which restricts the reach of public health initiatives.

One of the infodemic's most significant effects has been vaccine hesitancy. Lohiniva et al. (2022) emphasize how disinformation contributes to a decline in vaccine confidence, which is made worse by social media's ability to influence public opinion. They contend that in order to restore confidence and encourage wise health decisions, openness, public involvement, and proactive dispelling of myths are crucial.

In conclusion, the COVID-19 infodemic serves as an example of how false information can develop into a parallel crisis that jeopardizes public health, erodes institutional credibility, and generates fear. Public education, media accountability, technological reform, and effective crisis communication techniques that take into account the realities of an interconnected digital world are all necessary to address it.

1.5 Crisis Communication and Public Trust

In order to manage public trust during emergencies, crisis communication is essential. Its goals are to guide people through quickly changing and potentially unstable situations in addition to informing and reassuring them. The ability of institutions to preserve and restore credibility is a crucial component in guaranteeing public safety, behavioral compliance, and general institutional legitimacy in times of crisis is directly correlated with the efficacy of such communication.

The ability to deliver precise, timely, and actionable information is one of crisis communication's primary roles. The quick dissemination of false information during emergencies can greatly increase public anxiety and apprehension, frequently making the very problem it is intended to solve worse. According to Atasoy et al. (2022), companies like hotels, even in the private sector, need to use strong communication tactics in times of crisis like COVID-19 to safeguard their brand and maintain stakeholder trust. The same reasoning holds true for governments and other public institutions, where public confidence in the authorities and their managerial skills is directly impacted by the veracity of information that is shared. In this context, Michelow et al. (2023) contend that structured crisis responses can significantly boost public trust in institutions by providing concise explanations of the circumstances and specific recommendations for individual action.

A key component of successful crisis communication is transparency. People expect government operations to be transparent because it communicates accountability and promotes civic engagement, according to Fazal and Aslam (2023). A transparent communication approach promotes credibility in addition to making information easily accessible. However, as noted by Aissani (2021) and Dominic et al. (2022), a lack of clarity or delayed messaging can breed skepticism and cause the public to doubt the governing bodies' competence or motivations.

Public cooperation may be weakened at crucial times because of this breakdown of trust.

In public health emergencies, the Crisis and Emergency Risk Communication (CERC) principles are particularly important. To reduce behavioral risks and improve adherence to health protocols, the CERC framework highlights the importance of communication that is clear, credible, and responsive to public concerns (Wieland et al., 2020). This is further supported by Nurhakki et al. (2023), who demonstrate how well-planned and delivered public health messages can greatly increase adherence to governmental orders. Poor messaging not only lowers compliance but also compromises the overall effectiveness of institutional response in health emergencies like COVID-19.

Social media contributes to this dynamic in two ways. On the one hand, it gives government representatives and emergency managers a strong tool to communicate with citizens in real time and provide urgent updates. According to Mirbabaie et al. (2020), social media sites like Facebook and Twitter were essential for facilitating two-way communication and encouraging a sense of shared responsibility during crises like Hurricane Harvey and the COVID-19 pandemic. Additionally, Spence et al. (2015) claims that public perceptions of institutional credibility are directly impacted by the frequency and speed of information dissemination on social media. However, if communication is erratic or comes across as manipulative, this potential could turn into a liability. According to Mirbabaie et al. (2021) and Hagen et al. (2020), poorly executed social media campaigns can increase susceptibility to rumors and foster mistrust. Zeng et al. (2021) echoes this worry, pointing out that contradictory or unverified stories on social media during emergencies can erode institutional trust and make crisis management less successful.

Furthermore, participatory communication techniques and public engagement have become crucial elements in maintaining institutional trust. The benefits of electronic participation are examined by Afonina and Seryohin (2021), who show that citizens' trust in government actions rises when they are allowed to participate in the decision-making process. According to Huda and Suharno (2023), community-based programs also increase civic engagement and confidence in democratic processes. These results demonstrate that communication should be inclusive as well as educational, promoting discussion, criticism, and responsiveness.

The type of crisis is also important. Liu et al. (2014) show that various crises, whether man-made or natural, elicit different responses from the public and call for different communication tactics. Public hostility and the efficacy of institutional responses could be jeopardized if messaging is not adjusted to the nature and gravity of the crisis. This is further developed by Prepotenska et al. (2022), who contrast rhetorical styles in authoritarian and democratic contexts. They demonstrate that while authoritarian rhetoric frequently turns to division and propaganda, which may stifle dissent but undermine long-term trust, democratic rhetoric, which places an emphasis on openness and civic engagement, is more likely to foster social cohesion.

In conclusion, public behavior, trust, and compliance are greatly influenced by the way institutions communicate during emergencies. Effective crisis communication requires openness, prompt updates, interactive discussion, and trustworthy messaging. Although social media is an effective tool, it needs to be used carefully to prevent spreading false information or increasing public skepticism. In the end, strategic crisis communication is more than just an operational requirement; it is a fundamental component of democratic resilience and institutional legitimacy, particularly in a world increasingly influenced by complex global emergencies and rapidly evolving digital narratives.

1.6 Situational Crisis Communication Theory (SCCT)

This thesis uses three major theoretical frameworks the state of exception, digital authoritarianism theory, and situational crisis communication theory (SCCT) to examine how governments responded to disinformation during COVID-19. Each provides a unique perspective on how governments handle public trust, handle crises, and regulate information in digital spaces.

Coombs' Situational Crisis Communication Theory (SCCT) offers a framework for evaluating how organizations handle reputational risks in times of crisis. Three fundamental pillars are emphasized by SCCT: speed, transparency, and trust. These guidelines are essential for figuring out whether a public institution is seen as reliable and capable during emergencies. According to SCCT, an institution's chances of retaining its legitimacy and public support increase with the degree of openness, timeliness, and consistency of its messaging. This framework is especially

applicable in democratic settings, where legitimacy depends on open institutions, public discussion, and efficient governance.

On the other hand, Giorgio Agamben's idea of the "state of exception" describes how governments can utilize emergencies as an excuse to halt regular democratic processes. According to this theory, extraordinary measures that would be deemed illegal in peacetime, like censorship, surveillance, or the restriction of civil liberties, are politically justified during emergencies. This lens is particularly relevant to stressed hybrid regimes and democracies, where it becomes dangerously difficult to distinguish between short-term necessity and long-term repression. It highlights how times of crisis can allow institutions to overreach and alter the delicate balance between control and liberty.

Digital authoritarianism theory, the third framework, examines how authoritarian governments use digital tools as a weapon to manipulate public opinion. To control information flows, contemporary autocracies use algorithmic surveillance, platform manipulation, and legal repression in addition to traditional censorship. This model is evident in nations such as China, where a strictly regulated information environment is produced by a combination of state-run media, centralized digital governance, and punitive "anti-rumor" laws. However, hybrid regimes and even some democracies have adopted aspects of digital authoritarianism, which raises concerns about the gradual normalization of information control and surveillance under the pretense of crisis management.

When combined, these theories offer a comprehensive framework for comparing China, India, and Germany. They enable us to evaluate how and why governments' responses to disinformation reflected underlying institutional norms and political logics, in addition to what governments actually did to combat it. This thesis sheds light on the intricate relationship between public health, legitimacy, and state power during a global crisis by combining the theories of SCCT, the state of exception, and digital authoritarianism.

1.7 Censorship, Trust, and Crisis Response

In crisis management, censorship is a complicated and essential tool that directly affects democratic values, public confidence, and the legitimacy of the government. Its purpose differs greatly depending on the type of regime; in authoritarian contexts, it takes the form of overt repression, while in democratic contexts, it takes on more subdued, frequently contested forms. Censorship has a big impact on the information landscape and public opinion, especially in times of crisis, whether it is used to quell dissent or counter false information.

Censorship is a calculated tactic employed by authoritarian governments to keep power and stifle dissent. Many governments use psychological censorship strategies to influence citizen behavior and suppress dissent without outright prohibitions, as opposed to merely using overt repression. Nisbet et al. (2017), for example, demonstrate how the Russian government employs soft censorship techniques to quietly shape media framing and encourage public self-censorship. To prevent mobilization and silence critical voices, the Syrian regime used more aggressive tactics during the Arab Spring, such as banning independent news outlets and social networking sites (Al-Saqaf, 2016). Beazer et al. (2021) also highlights how authoritarian governments frequently persuade private actors to engage in censorship, resulting in a network of regime-induced private censorship that supports state initiatives. Particularly during unstable times, these actions show a desire to monopolize the narrative rather than merely limit information.

On the other hand, democratic governments typically place a strong emphasis on civil liberties protection, pluralism, and transparency. However, in times of crisis, even democracies may turn to censorship, which is frequently presented as a form of regulatory intervention. According to Stier (2015), democracies' handling of information in times of crisis is influenced by the strength of the laws governing media freedom. For the sake of public safety, governments may try to stop the spread of damaging false information, but this can easily conflate appropriate moderation with overreach. Hartwig et al. (2024) point out that people's perceptions of risk and their degree of trust in the government frequently influence their support for such interventions. Because efforts to moderate content can be viewed as either necessary regulation or a form of soft censorship, democratic regimes must carefully balance the need to protect free expression with

the need to protect the public interest.

The landscape of censorship has become even more complex in the digital age. Social media platforms offer avenues for both disinformation and dissent, making it difficult for any government to impose its will on narratives. According to Jin et al. (2011), digital platforms have changed how governments handle public messaging during emergencies by shifting the power of communication from institutions to individuals. Although these platforms promote openness and public participation, they also foster the spread of false information, leading governments to implement regulatory measures that occasionally resemble censorship.

The political and cultural context also affects public support for censorship. People may support censorship in authoritarian environments if they think it maintains social order. According to Wu (2021), a large portion of Chinese people are in favor of government censorship because they believe it promotes stability and unity within the country. In a similar vein, democratic citizens may agree to some speech restrictions during emergencies if they are justified by concerns for national security or public health. This acceptance, though, runs the risk of normalizing emergency measures that may persist after they are no longer warranted.

Concerns about the resilience of democracy are raised by this normalization of censorship. Ho et al. (2014) note that censorship in education restricts civic engagement and critical thinking, even in semi-democratic settings like Singapore. Festenstein (2015) cautions that self-censorship undermines the public sphere by stifling free thought and open discourse. It is frequently brought on by fear of social or political repercussions. Over time, these factors produce a chilling effect that reduces institutional accountability and erodes democratic engagement.

States frequently use emergencies as justifications to increase their power. Maddox and Malson (2020) warn that if not handled carefully, even well-meaning censorship can turn into repressive control, particularly when public health is invoked as an excuse. According to Saltiel and Sklias (2023), these tendencies are exacerbated during times of political or economic crisis, when governments may place a higher priority on maintaining control over democratic norms and transparency.

There are opposing forces despite these dangers. According to Leland and Bangert (2019), public participation and civic education can enable people to oppose censorship and stand up for democratic values. According to Huhe et al. (2018), digital spaces can foster democratic aspirations by exposing users to a variety of viewpoints and promoting critical reflection, even in countries like China that impose strict censorship.

All things considered, censorship has a significant impact on governance and trust, particularly during times of crisis. Democracies must strike a balance between the need to prevent misinformation and the requirement to preserve free speech, whereas authoritarian governments frequently use psychological or direct censorship to keep control. Governments must be aware of the long-term threats that censorship poses to institutional legitimacy and democratic vitality as they traverse this terrain, which is further complicated by the disruptive power of digital media. In order to prevent emergency measures from turning into long-term violations of democratic freedoms, citizens must simultaneously continue to be watchful in protecting areas for free speech. Although it may be most obvious in authoritarian nations, the "ghost of repression" also lurks in democracies.

1.8 Information Control Strategies Across Regime Types

Political regimes' institutional values, governing philosophies, and public relations are all revealed in the way they handle information during emergencies. Different patterns can be seen in the ways that authoritarian, hybrid, and democratic systems handle public discourse, interact with citizens, and deal with false information. In addition to influencing crisis outcomes, these strategies also impact public trust and the legitimacy of the government during emergencies.

The tenets of accountability, transparency, and civic engagement typically serve as the foundation for crisis communication in democracies. It is expected of governments to provide timely and accurate information while allowing citizens to freely voice their concerns and seek clarification. To ensure a constant flow of information and discussion, democratic institutions frequently use a variety of media platforms, both digital and traditional. According to Kim et al. (2004), reliance on the media rises dramatically in uncertain times, underscoring the significance

of distributing trustworthy information to reduce public apprehension and confusion. Furthermore, Hartwig et al. (2024) stress that user-centered tactics in democracies, like enhancing media literacy and equipping people to spot false information, promote public resilience and trust. Elections, civil society, and the free press hold governments responsible in these settings, allowing for responsive communication tactics that change to meet the changing demands of the populace. When combined, these systems improve public trust and adherence to safety and health regulations in emergency situations.

On the other hand, because hybrid regimes combine elements of authoritarianism and democracy, they offer a more complicated communication environment. On the surface, these systems might encourage public participation while stifling dissent. By stifling critical voices and using controlled communication platforms that mimic transparency, they frequently aim to justify their power. According to Xu and Sun (2021), these regimes frequently use a "top-down" strategy for crisis communication, which strengthens state control over information while providing little room for free speech. In these situations, patriotic messaging is employed to bolster public sentiment while suppressing opposing viewpoints, as Zhang et al. (2022) demonstrate. According to Hinck and Cooley, hybrid regimes may allow some public discussion to preserve the appearance of legitimacy, but their disinformation causes citizens to become confused and suspicious. This dichotomy control at its core, engagement on the surface erodes trust and prevents the emergence of a political culture that is truly participatory. According to Chen et al. (2015), hybrid regimes frequently produce reactive, inconsistent, and strategically ambiguous messaging as a result of their underlying emphasis on retaining power, even though they may show some responsiveness to public demands during crises.

To handle crises and keep control of public discourse, authoritarian governments, on the other hand, mainly rely on stringent censorship and propaganda. The goal of information governance in these systems is to portray governmental efficacy and reduce dissent. King et al. (2013) demonstrate how authoritarian governments employ selective censorship and digital surveillance to maintain control over online spaces, permitting mild criticism while stifling any ideas that pose a threat to the regime's power. According to Xu and Sun (2021), authoritarian crisis communication has changed to incorporate more creative propaganda techniques, but these still

stifle communication from the bottom up. In these situations, state-run media continue to play a crucial role in promoting official narratives and stifling dissent. According to Zeng (2016), authoritarian regimes are constantly improving their censorship tactics and employing advanced digital technologies to control public opinion and suppress dissenting opinions. According to Zhang et al. (2022), such systems may be successful in creating temporary legitimacy through crisis nationalism, but as people start to see the difference between propaganda and reality, the long-term result is frequently a decline in trust.

Fascinatingly, the boundaries of authoritarian information control have occasionally been revealed by crises like the COVID-19 pandemic. Chang et al. (2022) discovered that times of increased public anxiety caused information to leak out, momentarily making censored content accessible and exposing flaws in the government's narrative monopoly. This paradox emphasizes how authoritarian governments must strike a careful balance between regulating public opinion and meeting the public's increasing demands for transparency.

In the end, the methods governments employ to control information in times of crisis are indicative of larger regime traits and have a direct effect on public confidence. Authoritarian regimes prioritize order and unity through regulated and frequently repressive information policies, hybrid regimes frequently struggle with internal contradictions that impede consistent messaging, and democratic regimes typically use inclusive and transparent communication to reinforce institutional legitimacy. These differences are crucial to comprehending how political systems handle crises and build public trust in an increasingly complex and fast-paced global information environment.

1.9 Theoretical framework synthesis

The increasing dangers of information disorders misinformation, disinformation, and malinformation especially in times of crisis like the COVID-19 pandemic have been discussed in this chapter. It emphasized how these occurrences undermine democratic processes and institutional legitimacy in addition to interfering with public health responses. The chapter emphasized the importance of information management in modern governance by presenting information disorders as crises in and of themselves.

This review investigated how political regimes influence reactions to disinformation by referencing theoretical frameworks like situational crisis communication theory, the state of exception, and digital authoritarianism. In terms of censorship procedures, trust-building, and crisis communication tactics, it illustrated the clear trade-offs between civil liberties and public safety in authoritarian, hybrid, and democratic systems.

The comparative analysis that follows is predicated on this conceptual underpinning. The methodological framework for the thesis is presented in Chapter 2, which also explains why China, India, and Germany were chosen as case studies. It presents the comparative method for assessing how these three regimes handled the difficulties of managing disinformation during the COVID-19 pandemic.

Chapter 2: Methodology and Case Selection

2.1 Introduction

This chapter outlines the methodological framework used in this thesis to examine how different governments responded to misinformation during the COVID-19 pandemic. Ensuring that the research process is methodical, repeatable, and anchored in academic rigor requires an open and transparent approach. A qualitative comparative case study method has been chosen, reflecting the thesis's focus on government communication and regulatory strategies across different political systems. This chapter details the types of data used, justifies the choice of the three country cases; Germany, India, and China, explains the research design, and considers the constraints and difficulties faced during the research process.

Situational Crisis Communication Theory emphasizes trust, speed, and transparency as central to effective crisis responses. At the same time, concepts such as Agamben's "state of exception" and scholarship on digital authoritarianism reveal how crises can become opportunities for governments to extend control over information and limit civil liberties. Methodological choices in this thesis are shaped by these theoretical debates, since a comparative qualitative approach allows for a nuanced examination of how different regime types of balance public trust, state authority, and the management of information flows.

By examining a liberal democracy, a hybrid regime, and an authoritarian system, this study captures variation in how governments manage misinformation under similar crisis conditions. This approach highlights not only institutional differences but also the broader relationship between political systems and crisis communication. The analysis therefore contributes to both theory and practice by linking methodological design to pressing questions of governance, legitimacy, and resilience in times of crisis.

2.2 Research Design

This thesis analyzes government reactions to false information during the COVID-19 epidemic using a *qualitative comparative case study* design. This method is especially suited to handle complicated, context-specific events whereby quantitative data might not be able to capture the subtleties of political behavior, institutional strategies, or communication styles.

Analyzing how three different governments liberal democracy (Germany), hybrid government (India), and authoritarian government (China) reacted to the same worldwide challenge: an infodemic started by the COVID-19 epidemic; the study is *comparative* in nature. Aiming to find patterns and contrasts in policy responses, media regulation, and narrative control, it is also exploratory and descriptive, not so much testing causal relationships or future behavior.

The unit of analysis is the government's communication and regulatory response to COVID-19 misinformation, particularly in relation to digital platforms, press freedom, and citizen information access.

2.3 Case Selection

The countries selected Germany, India, and China were chosen using purposive sampling based on their contrasting regime types and global significance. The goal was to investigate how various political systems handle crisis communication and false information under pressure.

- **Germany** is widely regarded as a *liberal democracy*, ranked highly in global democracy indices (e.g., Freedom House, EIU). It offers a case of institutional transparency and strong protection for freedom of speech, making it a useful reference point for evaluating democratic responses to information crises.
- **India** represents a *hybrid regime*: while it maintains democratic structures like elections and an active press, recent years have seen increased media censorship, internet shutdowns, and political pressure on dissent. India thus occupies a middle ground that offers valuable insights into transitional governance responses to misinformation.
- **China** is an *authoritarian regime* with tight state control over media, speech, and the internet. The Chinese government's approach to misinformation during the pandemic is

rooted in its broader strategy of information control and digital surveillance, making it an essential point of contrast in this study.

During the epidemic, all three nations experienced high infection rates and strong digital misinformation, which led to a significant comparison and underlined how the type of government affects the balance between information control and free expression.

2.4 Data Sources and Methods

This research is based on qualitative content analysis of secondary sources. The data includes:

- Official government communications, including public health campaigns, press releases, and policies related to pandemics.
- Academic literature on media regulation, digital governance, crisis communication, and misinformation.
- Media reports from reliable national and international sources (e.g., BBC, The Guardian, Reuters, The Hindu, Xinhua).
- NGO and watchdog reports from organizations like Freedom House, Reporters Without Borders, and the World Health Organization.
- Social media policies and platform responses (e.g., Twitter, Facebook, Weibo) that reflect government influence or pressure.

Documents were reviewed and thematically coded based on recurring concepts such as transparency, censorship, trust, fact-checking, and public health framing. The focus was on identifying key narratives, regulatory shifts, and actions taken in response to misinformation, as well as examining how each government framed its approach to crisis communication.

Figures 1–7 are based on secondary datasets (V-Dem, Freedom House, RSF) and are used primarily to illustrate regime type differences and justify case selection. In contrast, Tables 2–4 and Figures 8–11 represent my own elaborations, created by synthesizing data from sources such as Twitter Transparency Reports, Access Now’s #KeepItOn Shutdown Tracker, and Citizen Lab’s Censored Contagion reports. These visuals form part of the original results of this study.

2.5 Limitations of the Study

Several constraints affect the scope and interpretation of this research:

- **Access to information:** In authoritarian settings like China, government vagueness and media censorship limit access to full and unbiased data. This introduces gaps and may underrepresent some state actions or public reactions.
- **Language and media bias:** Although the study mostly relies on English-language sources, some national debates or communications might not be totally reflected. Moreover, media reports, especially from non-neutral sources may reflect political or ideological biases.
- **Comparability:** While all three countries experienced COVID-19, direct comparisons are complicated by variations in demographics, public health infrastructure, and digital access.
- **Researcher positionality:** As an external observer, both academic framing and personal background influence the researcher's interpretations. Although steps were taken to ensure objectivity, some implicit bias may persist.

These constraints are acknowledged in the interpretation of results, particularly in the comparative analysis that follows.

Establishing this qualitative comparative framework and its scope opens the chapter for a thorough investigation of Germany, India, and China's divergent approaches for countering COVID-19 misinformation.

Chapter 3: Case Studies and Governmental Responses to Misinformation

3.1 Introduction

In this chapter, we examine the ways in which three distinct political regimes China (authoritarian state), India (hybrid regime), and Germany (liberal democracy) applied different tactics to combat the COVID-19 infodemic. This thesis adheres to the traditional categorizations of political regimes: authoritarian regimes are centralized power structures that restrict freedom of the press and dissent; hybrid regimes combine democratic elements with authoritarian practices; and democracies are systems founded on pluralism, free elections, and civil liberties. The main themes of each case study are narrative framing, media participation and official messaging, legal and platform-based moderation, and the harmony (or conflict) between free speech and the control of false information. We can find both common patterns and regime-specific tactics for containing misinformation during a global health emergency by comparing these national responses.

3.2 Germany: A Liberal Democracy's Approach

The German approach to countering false information has been multifarious, combining legal mandates, platform-based content moderation, proactive media engagement, narrative framing, and careful examination of free speech rights. Legal studies and empirical data provide evidence that helps define the justification and results of these policies. German legal actions have been carried out to bind digital platforms specifically. German authorities aimed to encourage quick and forceful action against false information by demanding timely removal of offensive material and imposing financial penalties on noncompliant platforms. Such legal approaches have been debated in the literature as needing a multifarious approach that balances responsibility with hazards to democratic discourse and are part of larger worldwide efforts. Platform-based policies complement these legislative actions by including citizen-report-based evaluations and algorithmic filtering to lower the visibility of false information. Although these automated and community-based moderation techniques can alienate some users and create operational

difficulties, research shows that even if they can reduce the circulation of harmful content, these legal and platform-based policies are meant to complement each other in Germany so that the private practices of digital platforms fit public demands of openness and responsibility (Freiling et al., 2023).

Strong public and media engagement has helped to preserve openness and trust. German authorities understand that public confidence determines the validity of moderation initiatives; thus, they actively present policy justifications and clear evidence supporting intervention. Empirical research, including the two-wave panel study carried out during the COVID-19 epidemic, shows that public support for disinformation control was raised by confidence in media and democratic institutions (Freiling et al., 2023). Additionally, authorities sought to bridge the gap between state action and citizen understanding by involving experts and journalists to disseminate clear, accessible explanations of how and why certain information was moderated. It is argued that reducing the impression of government overreach in digital environments depends on a strategy of open communication and responsiveness to changing public opinions (Iyiola, 2024).

Narrative framing significantly shapes public knowledge. By emphasizing factors like scientific consensus, German officials and allied media communicators can help counteract misinformation and strengthen confidence in accepted knowledge. By stressing the credibility of scientific institutions and the empirical basis of policy decisions, the strategic use of narrative reframing as advised by the literature on prebunking and inoculation theory helps preempt the acceptance of false narratives by foregrounding. This framing assures people that policies against false information are based on objective facts and strengthens resilience against later false assertions, guiding a more informed citizenry (Lewandowsky & Linden, 2021).

These policies, however, have created conflicts regarding the defense of free expression. Legal requirements and aggressive content editing inevitably generate questions regarding possible censorship and the suppression of many points of view. Although the epistemic imperative to eliminate damaging false information is strong, academics point out that actions imposing strict content removal obligations run the danger of chilling honest communication (Ang et al., 2023). Moreover, debates inside human rights literature show that even if improving openness and

responsibility is crucial, any legislative system has to be precisely calibrated to prevent too limited public debate and individual expression (Iyiola, 2024). Policymakers, legal experts, and civil society organizations both in Germany and abroad continue to be stimulated by these conflicts between protecting the public from damaging false information and upholding free speech.

Germany's legal system and platform-based content moderation policies are meant to stop the spread of false information and interact with the public and media to guarantee openness and confidence at the same time. Public knowledge is greatly shaped by narrative framing that stresses the collective voice of scientific consensus; yet these initiatives are not without controversy since they interact with issues regarding the protection of free speech. The German experience reflects the inherent difficulty of controlling digital communication in a way that preserves democratic liberties and society's welfare at the same time. According to RSF, Germany's Press Freedom Score declined from 87.84 in 2020 to 81.91 in 2024, while its global rank shifted from 11 to 21, suggesting a moderate erosion of media freedom under pandemic stress, despite its democratic resilience.

3.3 India: A Hybrid Regime's Strategy

The way the Indian government responded to COVID-19 false information combined democratic and autocratic aspects. This approach included measures that spurred major civil society as well as media scrutiny, targeted communication campaigns, and multifarious tools of content control. India used legal and administrative tools, including the Information Technology (IT) Rules, which mandated online intermediaries to undertake stricter due diligence measures and rapidly remove content judged misleading to counteract false information. In parallel, the government supported or created fact-checking websites meant to validate COVID-19-related claims, trying to prevent the quick spread of misleading information. Particularly in a setting where political and religious narratives had contributed to intercommunal tensions, these digital rules were meant to control the flow of narratives during the epidemic and help prevent public health risks related to misinformation (Al-Zaman, 2021).

Simultaneously, the Indian government instituted internet blackouts or restrictions in some sensitive areas, usually in areas prone to social unrest. These closures were enforced during times of increased anxiety, usually in response to worries about false information or inflammatory content possibly upsetting already unstable local conditions. In 2020, India recorded 25 internet shutdowns related to such concerns, rising to 37 in 2024. These limitations had major negative effects, even if the intended goal was to stop the dissemination of damaging false information and prevent possible public disturbance. Their interference with access to essential health information and their hindrance to social and economic connectivity stoked public discussion about the proportionality and openness of such policies (Dhawal et al., 2020).

Another pillar of the COVID-19 reaction in India is official messaging campaigns. Launched digital apps including Aarogya Setu, issued regular advisories, and held press briefings meant to present a coherent crisis management story, the government also launched the messaging strategies using a multi-pronged approach by emphasizing national resilience and scientific consensus to help validate the crisis response and build public confidence. This well-chosen framing was meant to not only reaffirm the state's dedication to public health but also prevent the legitimacy of other narratives. These movements aimed to combat false information by emphasizing technological innovation and national solidarity, thus strengthening an image of a proactive and forceful government reaction (Su et al., 2022).

But the variety of these control policies caused strong opposition from media sources as well as from civil society. Critics argued that frequent internet shutdowns and the IT Rules constituted an infringement on free speech and information flow, thereby raising concerns about state overreach and the potential for censorship. Independent media, digital rights organizations, and civil society activists questioned both the openness of the regulatory procedures and the larger influence on democratic freedoms (Kaim & Kubbe, 2025). The discontent was exacerbated by ideas that these policies, while meant to reduce false information, unintentionally suppressed valid dissent and hampered people's access to a range of opinions during a public health crisis of importance. As reflected in RSF data, India's Press Freedom Score dropped dramatically from 54.67 in 2020 to 36.62 in 2024, and its global rank plummeted to 161, highlighting growing restrictions and declining media freedom during this period.

The Indian government's response to COVID-19 false information combined content control via IT rules and fact-checking portals with strategic internet shutdowns in sensitive areas and proactive official messaging campaigns stressing scientific consensus and national unity. The policies, despite these initiatives to control misleading narratives and maintain public order, faced strong objections from media and civil society, highlighting natural conflicts between suppressing false information and preserving free expression.

3.4 China: An Authoritarian Model of Control

China's authoritarian approach to controlling COVID-19 misinformation employed a sophisticated combination of technological censorship, state-controlled messaging, and legal punitive measures, all of which have had complex effects on public trust and compliance. First, in terms of censorship, China used its Great Firewall in concert with intense social media monitoring to stifle material that strayed from the official story. Filtering content and blocking access to foreign websites and platforms that might host dissenting opinions or critical analysis of the government's handling of the epidemic was made possible in significant part by the Great Firewall. Concurrently, authorities instituted extensive social media monitoring systems using automated algorithms and human censors to delete posts or stop the dissemination of online content judged to be false or contradictory to the official discourse. This dual strategy not only slowed down the rapid spread of alternative narratives but also fostered a culture of self-censorship among users, thereby ensuring that online debates would not contradict the official narrative (Leng et al., 2021).

The official narrative was built and reinforced in great part by state media and propaganda outlets. Media under state control spread well-chosen material stressing national unity, scientific advancement, and effective crisis management. By means of ongoing press briefings, feature stories, and interviews with government-designated experts, these outlets offered a consistent narrative that presented the government's response as determined and grounded in evidence. The goal of this centralized propaganda strategy was to prevent varying interpretations and enhance public trust and solidarity through shared experiences. Through information monopolizing, state media guaranteed that most of the population got an interpretation of events closely corresponding with government policy and priorities (Leng et al., 2021).

Apart from technical and propagandistic strategies, the Chinese government also used legal systems to punish those judged "rumor-mongers." Legislative and administrative actions criminalized the dissemination of unverified information capable of upsetting social equilibrium. People designated as disseminators of rumors were identified using legal instruments; these people could be subjected to fines or detention. Laws that defined "rumors" in limited terms strengthened this legal punitive approach even more by suppressing any communication that deviated from the officially approved narrative (Sun, 2023). Strong discouragement against the spread of alternative narratives of the epidemic stemmed from the possibility of dire legal consequences.

Strong information-control policies have had several effects on public confidence and compliance. For those who relied just on state media for information, the effective silence of dissenting voices and the continuous reinforcement of a uniform narrative helped explain high degrees of public health directive compliance. Since people had little access to opposing points of view, the regulated information environment helped citizens to quickly mobilize and follow advised actions. Conversely, over time, the widespread censorship and punitive policies could have eroded real public confidence among more dubious citizens or those who came across scattered unofficial channels of communication. Under such circumstances, the lack of openness and the severe penalty for deviation could cause alienation or fear, thus undermining long-term confidence in governmental institutions even in cases of temporary compliance (Sun, 2023). According to RSF, China's press freedom score remained very low: 21.52 in 2020 and only slightly increased to 22.97 by 2024, with a global rank of 179, indicating sustained authoritarian control over media.

In summary, China's authoritarian model employed the Great Firewall and social media monitoring to suppress COVID-19 misinformation actively while state media and propaganda mechanisms reinforced an official narrative that underpinned public compliance. The use of legal and punitive measures against so-called "rumor-mongers" further contributed to this environment of control, engendering both efficient crisis management and significant concerns about transparency and public trust. These three case studies demonstrate how regime type fundamentally shapes the choice and combination of legal, technical, and communicative tools used to manage misinformation during a global health crisis.

3.5 Comparative Overview of Governmental Responses to COVID-19 Misinformation (2020–2024)

The table below provides a comparative summary of key indicators reflecting how Germany, India, and China responded to the COVID-19 misinformation crisis. It highlights the influence of regime type on digital regulation, public messaging, and civil liberties between 2020 and 2024.

Metric	Germany (Liberal Democracy)	India (Hybrid Regime)	China (Authoritarian State)
Regime Type (2020)	Liberal Democracy	Electoral Democracy	Closed Autocracy
Regime Type (2024)	Liberal Democracy	Electoral Autocracy	Closed Autocracy
RSF Score (2020)	87.84	54.67	21.52
RSF Score (2024)	81.91	36.62	22.97
RSF Global Rank (2024)	21	161	179
Internet Shutdowns (2020)	0	25	N/A
Internet Shutdowns (2024)	0	37	N/A
Platform Regulation	NetzDG enforcement	IT Rules, forced takedowns	Direct control over platforms
State Narrative Strategy	Science-based, transparent	Nationalist and mixed	Propaganda via state media
Legal Actions for Misinfo	Minimal	Frequent (Sedition, FIRs)	Routine detentions for “rumors”
Citizen Trust Trends	Relatively stable	Declining	Short-term compliance, long-term erosion

Table 1: Comparative Political Context and Platform Regulation in Germany, India, and China (2020–2024)

Source: Own elaboration based on Freedom House (2015–2024), Reporters Without Borders (2020–2024), and V-Dem (2015–2024)

While Table 1 offers a static comparison between 2020 and 2024, the following figures draw on the Varieties of Democracy (V-Dem) dataset to illustrate longer-term trajectories (2010–2024) for key democratic and informational indicators: Liberal Democracy, Electoral Democracy, Freedom of Expression & Alternative Sources of Information, and Academic Freedom.

The dashed vertical line marks the onset of the COVID-19 pandemic (2020). These trends contextualize the shifts observed in the case studies, revealing that while Germany maintained relatively high scores, India experienced pronounced declines across all measures, and China remained consistently low.

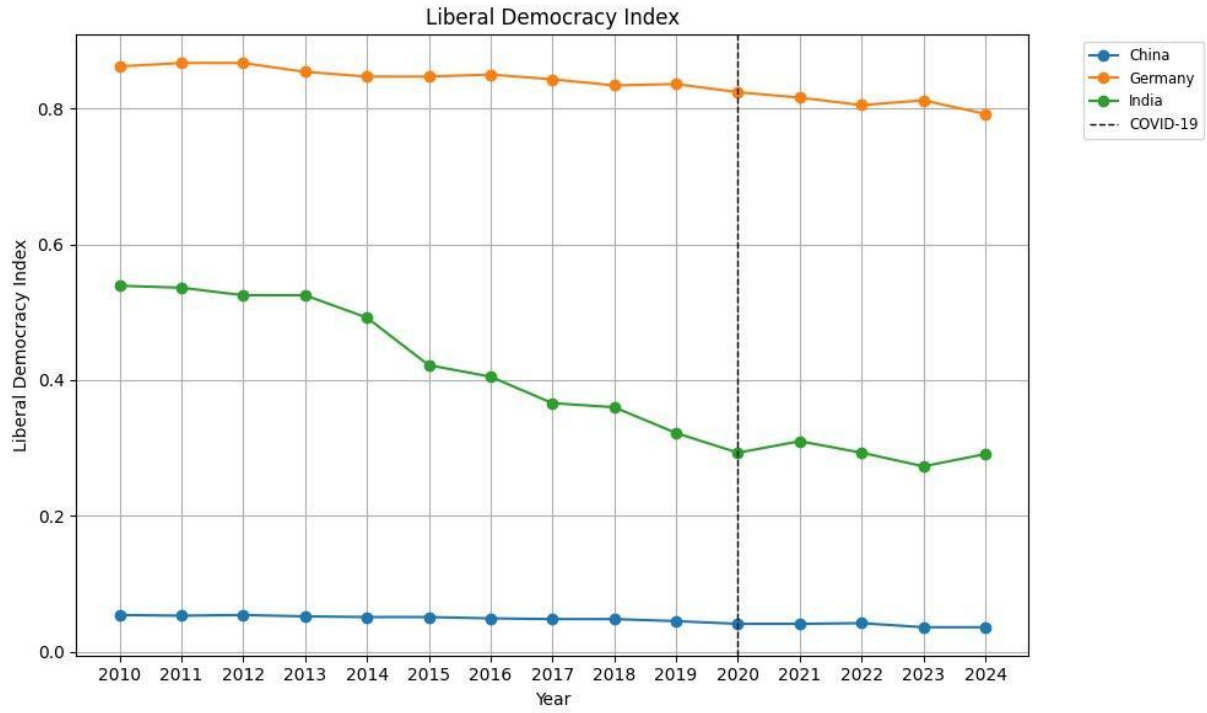


Figure 1: Liberal Democracy Index

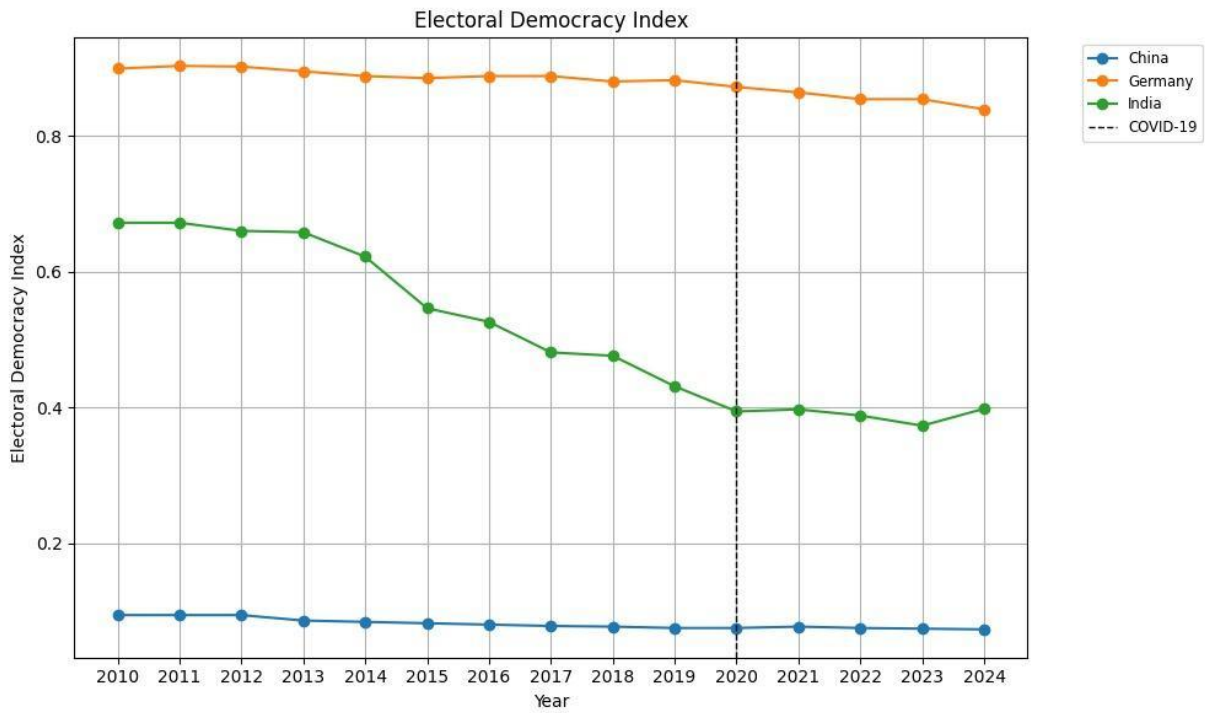


Figure 2: Electoral Democracy Index

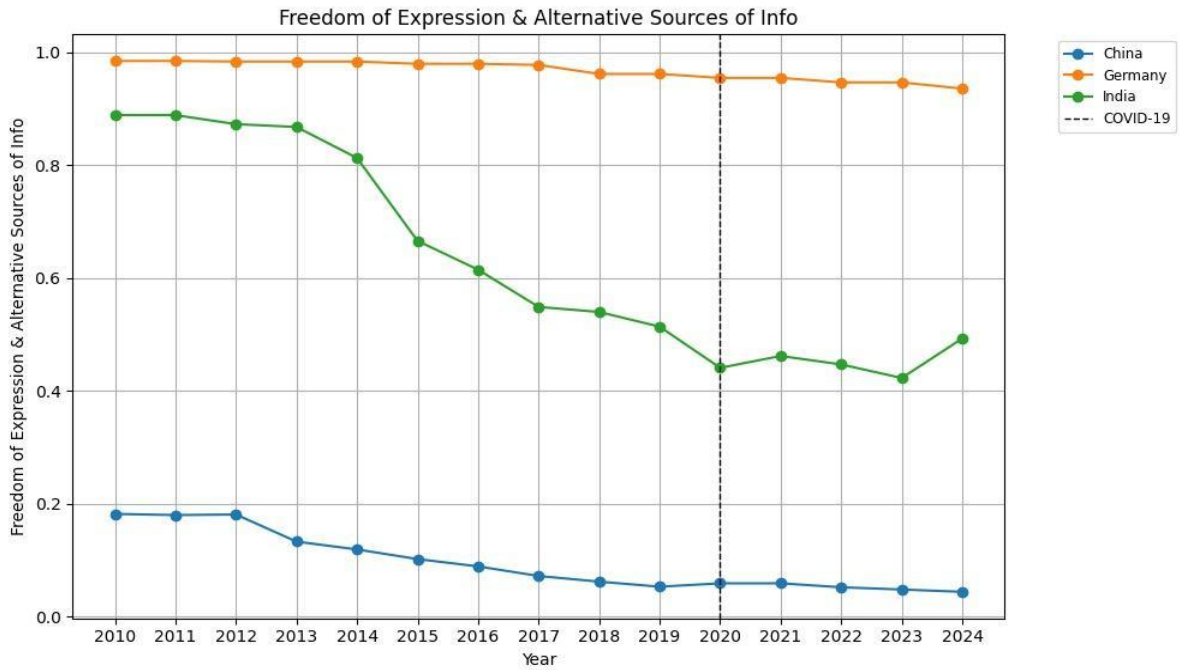


Figure 3: Freedom of Expression & Alternative Sources of Info

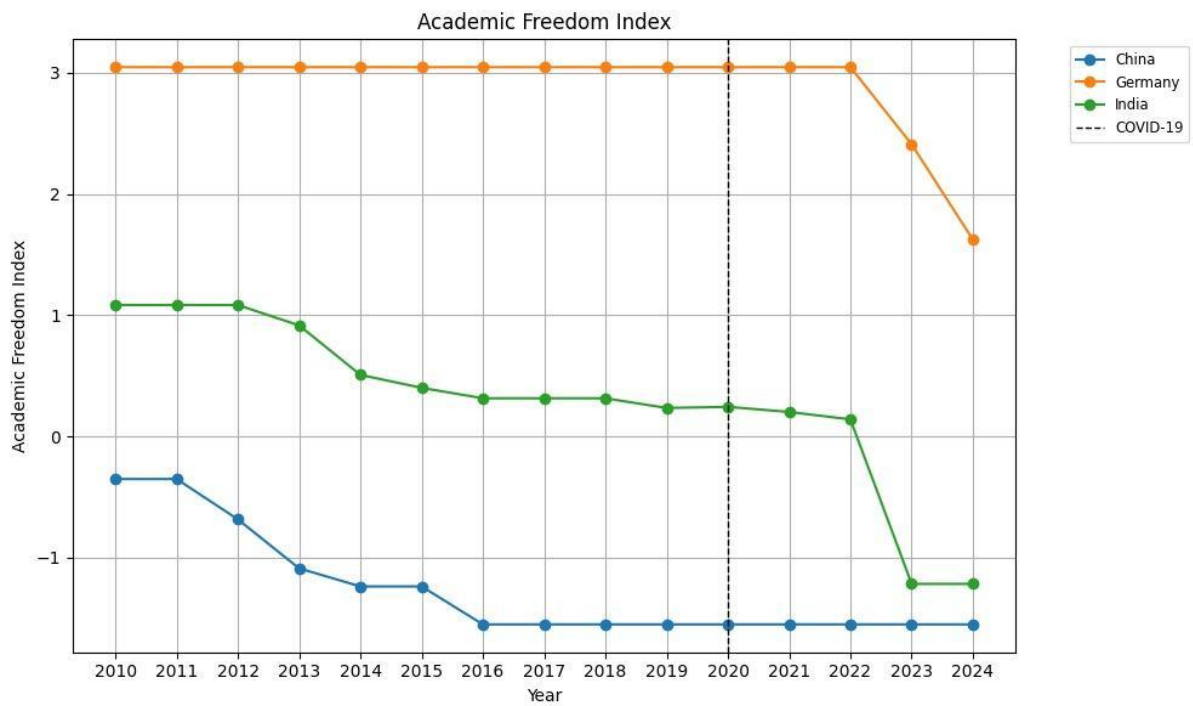


Figure 4: Academic Freedom Index

Source: V-Dem Dataset (2024), own elaboration.

To complement the V-Dem indices, this analysis incorporates data from Freedom House’s Freedom in the World reports, which provides an independent assessment of political rights and civil liberties. These scores allow for a clearer comparison of democratic trajectories before, during, and after the COVID-19 pandemic. Figures 5,6,7 present the total scores, and their two sub-dimensions, for Germany, India, and China between 2015 and 2024.

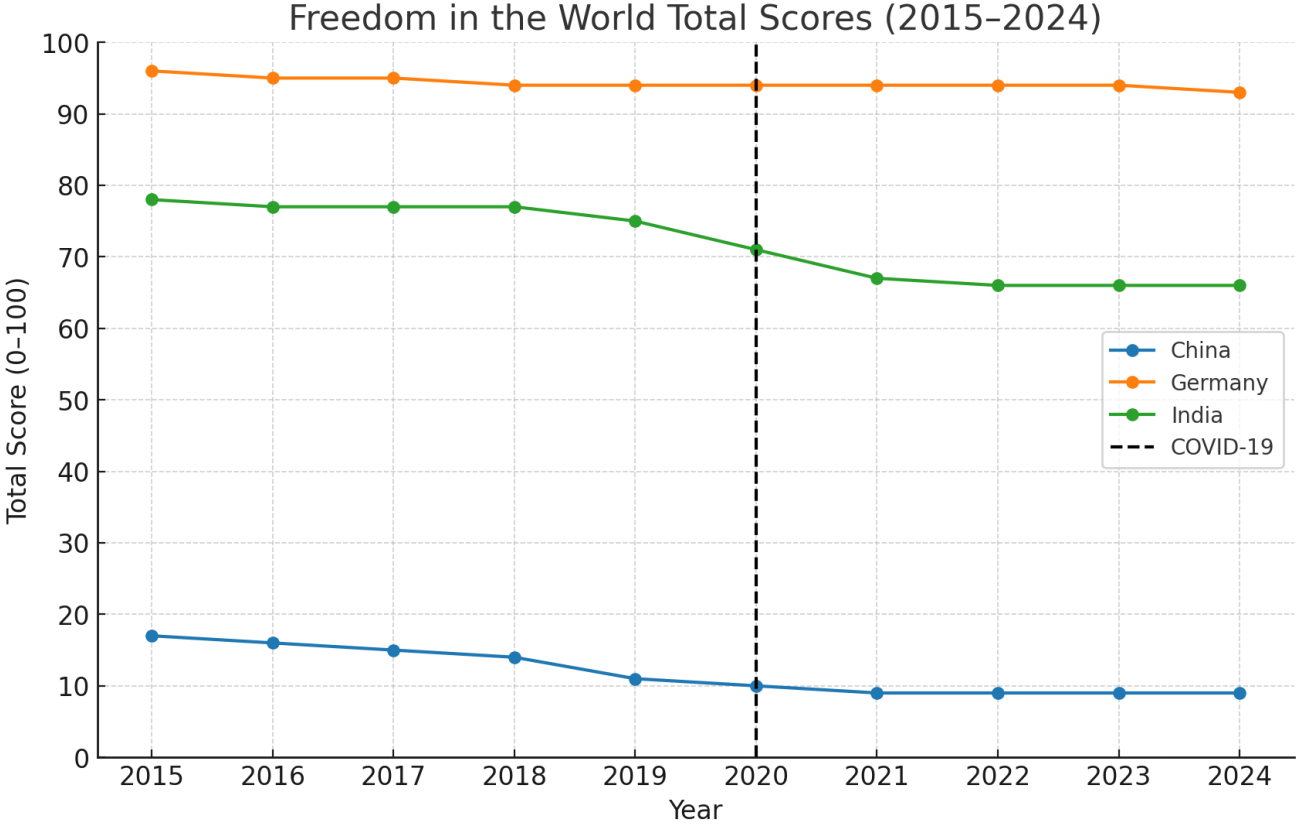


Figure 5: Freedom in the World Total Scores (2015–2024)

Source: Freedom House (2015–2024), own elaboration.

Germany’s scores remain consistently high (93–96), confirming its stable democratic performance. India, by contrast, declines from 78 in 2015 to 66 in 2024, with the sharpest drop occurring between 2019 and 2021, a period that coincides with the pandemic and stricter information controls. China remains at the bottom of the scale (9–17), entrenched in the “Not Free” category throughout.

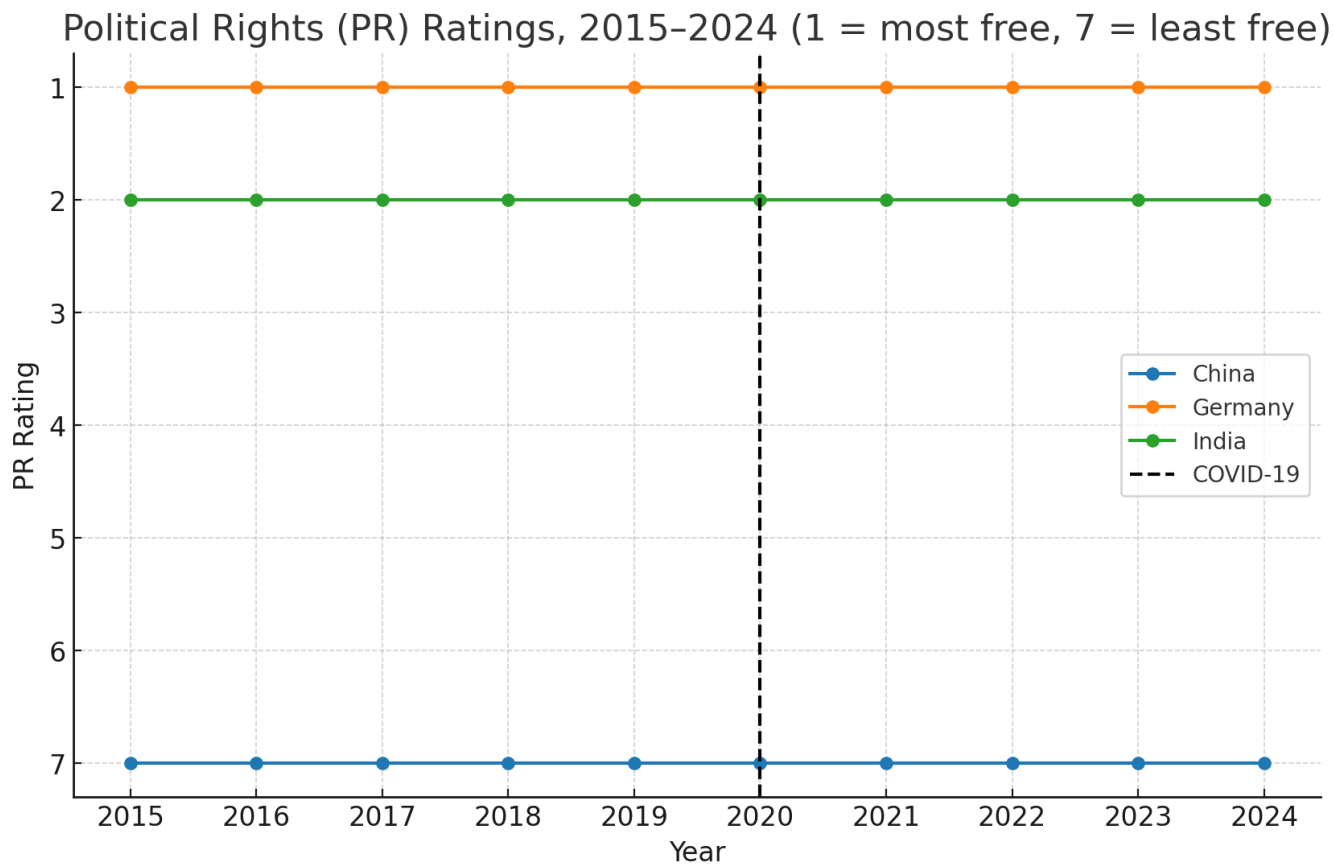


Figure 6: Political Rights (PR) Ratings, 2015–2024

Source: Reporters Without Borders (RSF) (2015–2024), own elaboration.

Germany remains fully free with a PR rating of 1, while China is consistently rated 7. India’s PR rating remains stable at 2 throughout the period, suggesting that changes in India’s democratic trajectory during and after the pandemic are more evident in civil liberties and broader freedom indicators than in political rights alone.

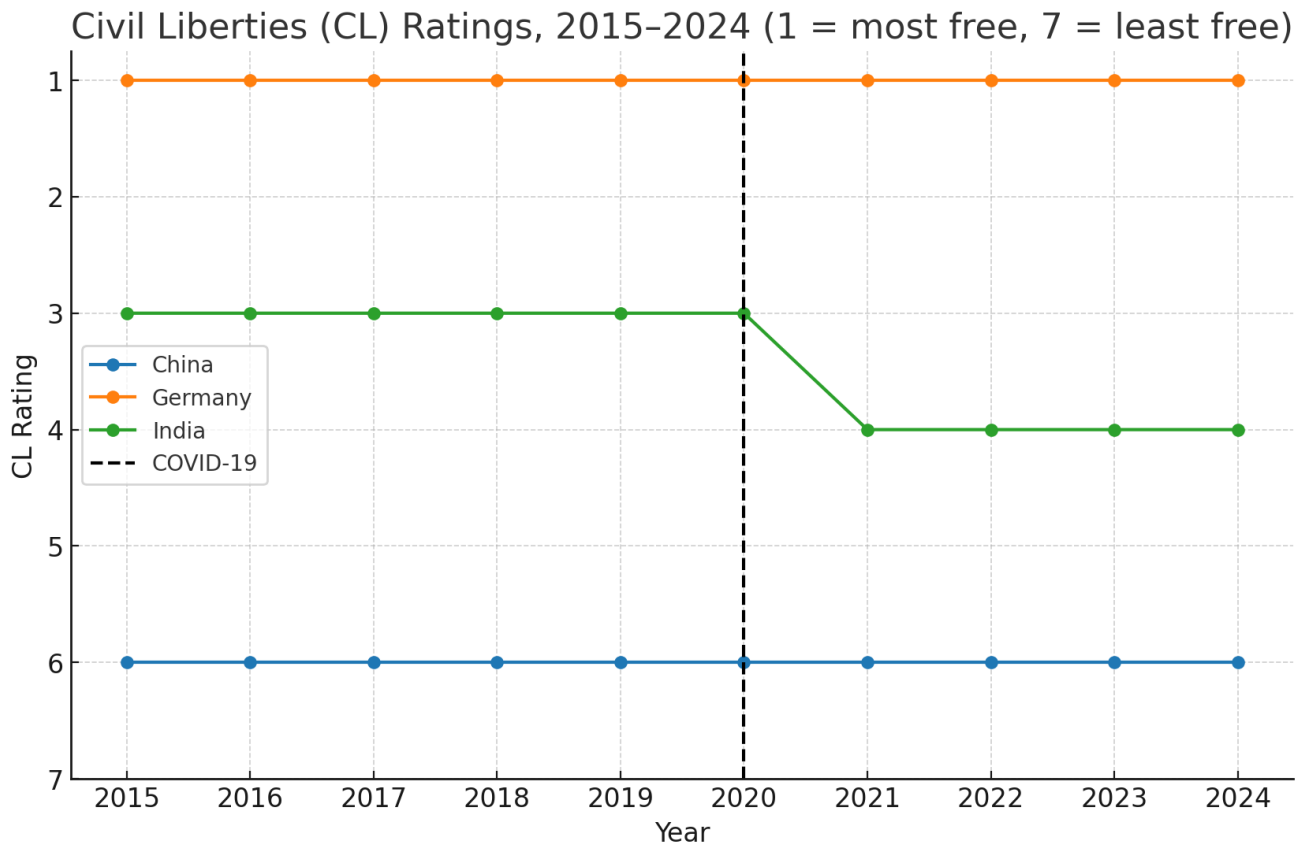


Figure 7: Civil Liberties (CL) Ratings, 2015–2024

Source: V-Dem (2024), Freedom House (2015–2024), RSF (2015–2024); own elaboration.

Germany maintains the highest level of civil liberties (1), while China is rated 6–7. India declines from 3 to 4 after 2019, reflecting a deterioration in freedoms of expression, association, and rule of law, again aligning with pandemic-era restrictions.

Synthesis:

Taken together, Figures 5, 6, and 7 illustrate a clear divergence in democratic trajectories across the three cases. Germany has remained consistently classified as “Free,” with high overall scores and stable ratings for both political rights and civil liberties. China, by contrast, is entrenched in the “Not Free” category, displaying persistently low scores across all dimensions throughout the period. India represents the most significant change: while rated “Free” in 2015, it experienced a deterioration in democratic conditions that culminated in its reclassification as “Partly Free” from 2021 onwards. This shift is driven primarily by a decline in civil liberties, which worsened from a rating of 3 to 4 during the pandemic period, while India’s Political Rights score remained numerically stable. Freedom House’s disaggregated indicators therefore reveal that India’s democratic backsliding is most clearly concentrated in restrictions on civil liberties rather than formal political rights, a pattern that aligns with trends identified in the V-Dem and RSF data sets.

Chapter 4: Comparative Analysis

While international indices such as V-Dem, RSF, and Freedom House highlight the broader trajectories of political rights and freedoms, they cannot fully capture the concrete mechanisms through which governments regulate online information. To address this gap, this chapter compares the practical strategies adopted by Germany, India, and China during the COVID-19 pandemic. The analysis focuses on official communication campaigns, censorship practices, and takedown requests to digital platforms, revealing both shared patterns and sharp divergences across political systems.

4.1 Common Patterns and Divergences

Though they differed greatly in openness and the defense of free speech, all three governments, Germany, India, and China, used official messaging and content-control systems to combat COVID-19 misinformation. Establishing legal and technical systems for fact-checking and content moderation constituted a universal strategy. While India activated its IT Rules alongside dedicated fact-checking channels to intercept false narratives, Germany imposed clear legal obligations on digital platforms and used community reporting to reduce misleading content (Kamalrathne et al., 2023). China combined the Great Firewall with extensive social media surveillance to censor any content in conflict with the official pandemic narrative (Gao, 2021).

The significance of coordinated public communication was also acknowledged by all three governments. While China centralized its messaging through state-run media and propaganda outlets to reinforce national unity and trust in government efficacy (Gao, 2021), Germany and India held regular press briefings and launched mobile apps to distribute current health directives (Berg et al., 2021).

Despite these shared tactics, the governments took quite different approaches to civil liberties, protection and openness. Germany's policies were based on responsibility and continuous communication with civil society. India's hybrid approach combined similar regulatory actions with sporadic internet shutdowns in areas of tension, tactics that, while aimed at preventing

upheaval, also disrupted legitimate information flows and drew civil-societal criticism (Ceron, 2020). China's model was clearly authoritarian, relying on widespread censorship and punitive actions against so-called "rumor-mongers," which reduced any avenue for dissent (Gao, 2021). These variations show how the political environment of each government affected its balance between suppressing false information and safeguarding or limiting public dialogue.

These patterns are also visible in government takedown requests to Twitter during 2020. As shown in Table 2, India submitted by far the largest number of legal demands (9,743) and specified accounts (32,328), reflecting its heavy use of content-removal mechanisms during the pandemic. Germany's figures were moderate (65 legal demands and 68 accounts specified), while China's activity was minimal in comparison, largely because Twitter is banned nationwide. Instead, Chinese citizens primarily use domestic, government-regulated platforms such as Weibo, WeChat, and Douyin, which are subject to real-time censorship and keyword filtering. This tightly controlled digital ecosystem allows authorities to manage online discourse internally, reducing reliance on foreign platforms and making Twitter takedown statistics a limited measure of China's overall information-control strategy.

Country	Combined legal demands ¹	Accounts specified ²	Accounts actioned ³	Tweets withheld ⁴	Compliance rate ⁵
Germany	65	68	7	39	10.29
India	9743	32328	2546	975	7.88
China*	103	103	12	-	11.65

Table 2: Twitter Government Removal Requests – Germany, India, China (2020)

Source: Own elaboration based on Twitter Transparency Report (2020).

*Twitter is blocked in China; these numbers may reflect residual or indirect activity.

Notes:

1. **Combined legal demands:** Total number of government-issued legal orders to remove content from Twitter.

2. **Accounts specified:** Number of unique Twitter accounts identified in these legal demands for removal or restriction.
3. **Accounts actioned:** Number of specified accounts on which Twitter took action (e.g., suspension, content restriction).
4. **Tweets withheld:** Number of individual tweets hidden or restricted from view in the relevant country due to legal demands.
5. **Compliance rate:** Percentage of government requests that Twitter fully or partially complied with.

The minimal Chinese figures in Table 2 should not be interpreted as evidence of weak government intervention in online communication. Rather, they reflect the fact that Twitter, along with other Western social media platforms such as Facebook, Instagram, and YouTube, is blocked nationwide in China. As a result, Beijing does not rely on takedown requests to foreign companies but instead exercises direct authority over a domestic digital ecosystem dominated by Weibo, WeChat, and Douyin. These platforms are subject to comprehensive real-time monitoring, keyword filtering, and AI-driven moderation systems that automatically suppress politically sensitive or pandemic-related terms. Research by King, Pan, and Roberts (2017) and Gao (2021) shows that millions of posts are removed annually through such automated and human review processes, often without public record or external transparency.

This structural difference underscores a fundamental divergence between the Chinese model and those of Germany and India. Whereas Berlin and New Delhi employed formal legal instruments that generated measurable takedown statistics on Western platforms, China pursued an authoritarian approach that leaves little trace in transparency reporting. Instead, censorship manifests in the form of blocked websites, banned keywords, state-sponsored fact-checking campaigns, and punitive actions against so-called “rumor-mongers” who contradict official COVID-19 narratives. The absence of quantitative transparency data for China is therefore itself a finding: it illustrates how authoritarian information control operates through closed domestic systems, which are both more opaque and more pervasive than the regulatory frameworks seen in democratic contexts.

4.2 Regime Type and Response Logic

- Germany’s liberal democracy relied on deeply ingrained legal traditions and democratic values to shape a balanced approach. Platform-based moderation and regulatory interventions were carried out within a framework of procedural protection and public accountability. Volk (2021) shows that German crisis-communication initiatives regularly appealed to democratic principles, ensuring that health-related policies aligned with public expectations of openness and civic participation. In addition, Germany’s *Network Enforcement Act (NetzDG)* imposed clear obligations on digital platforms to remove unlawful content, including pandemic-related misinformation, while independent organizations such as *Correctiv* partnered with Facebook to provide fact-checking. Importantly, these measures were embedded in a system of judicial oversight and civil-society consultation, which helped maintain legitimacy and distinguish Germany’s approach from more restrictive models elsewhere.

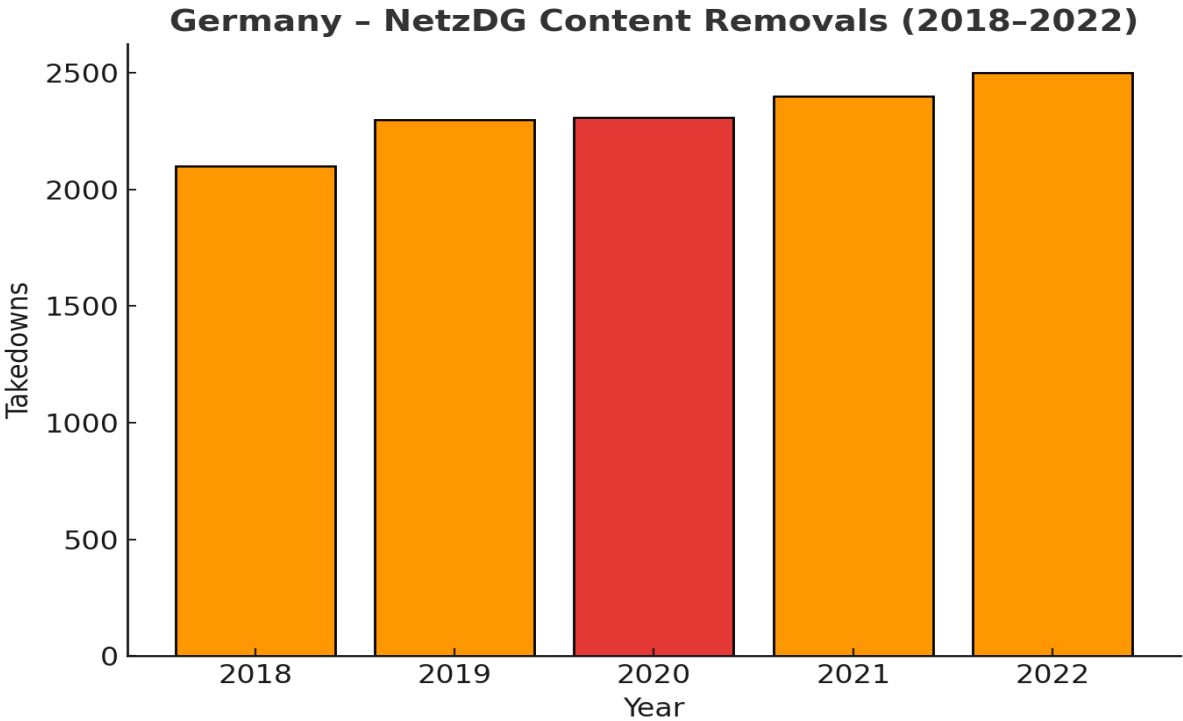


Figure 8: Germany – NetzDG Content Removals

Source: Own elaboration based on Twitter Transparency Reports (2018–2022).

As shown in Figure 8, Germany’s takedown numbers under NetzDG remained stable between 2018 and 2022, with only a modest change in 2020. This demonstrates that even during the pandemic, Germany relied on existing legal frameworks rather than extraordinary measures.

- India’s hybrid political system combined democratic outreach with authoritarian measures. The government used its IT Rules and enforced targeted internet shutdowns to control public tensions and reduce false narratives. At the same time, independent media and fact-checking organizations worked to inform the public. Islam (2024) describes this dual-track crisis management as a blend of majoritarian nationalism and state surveillance, where democratic engagement and coercive control coexist. This tension was especially visible during the pandemic in regions such as *Kashmir*, where prolonged internet shutdowns limited access to vital health updates and disrupted education. Rights groups argued that such blanket restrictions undermined democratic accountability and disproportionately harmed ordinary citizens, even as the government justified them as necessary for preventing unrest.

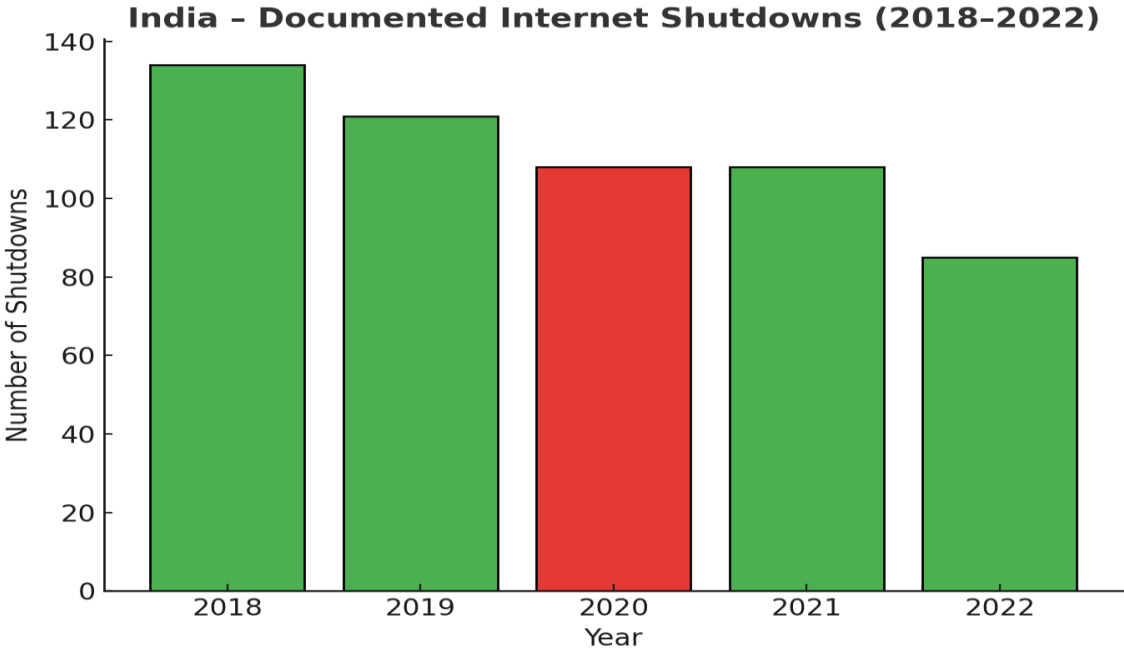


Figure 9: Documented Internet Shutdowns in India

Source: Author’s elaboration based on Access Now, #KeepItOn Shutdown Tracker (2018–2022).

As shown in Figure 9, India consistently recorded the highest number of internet shutdowns worldwide between 2018 and 2022. The number peaked at **134 shutdowns in 2018**, remained high during the pandemic year (**108 in 2020**), and only declined modestly thereafter. These figures highlight the extent to which shutdowns became normalized as a state tool of information control, even during a period when timely access to online health updates was most critical.

- China's authoritarian system prioritized social stability over pluralistic debate. The government relied on state media, the Great Firewall, and extensive social media monitoring to maintain a single, state-approved narrative. Punitive measures against "rumor-mongers" further deterred dissent. Unlike Germany and India, China did not need to make extensive use of Twitter takedown requests, because Twitter is banned nationwide. Instead, information control is exercised almost entirely within domestic platforms such as Weibo, WeChat, and Douyin. A prominent example of this approach was the case of *Dr. Li Wenliang*, the Wuhan-based doctor who attempted to warn colleagues about the novel coronavirus in late 2019 but was reprimanded by authorities for "spreading rumors." His silencing, and subsequent death from COVID-19, became emblematic of the risks faced by those who contradicted official narratives and demonstrated how punitive censorship shaped the early course of the pandemic. These platforms operate under strict state regulations, enabling keyword filtering, content removal, and account suspensions in real time. This centralized digital environment allowed China to manage COVID-19 narratives without relying on external platforms, reinforcing the role of its political system in shaping its crisis response.

China - Cumulative COVID-19 Related Keywords Censored on WeChat (Jan-May 2020)

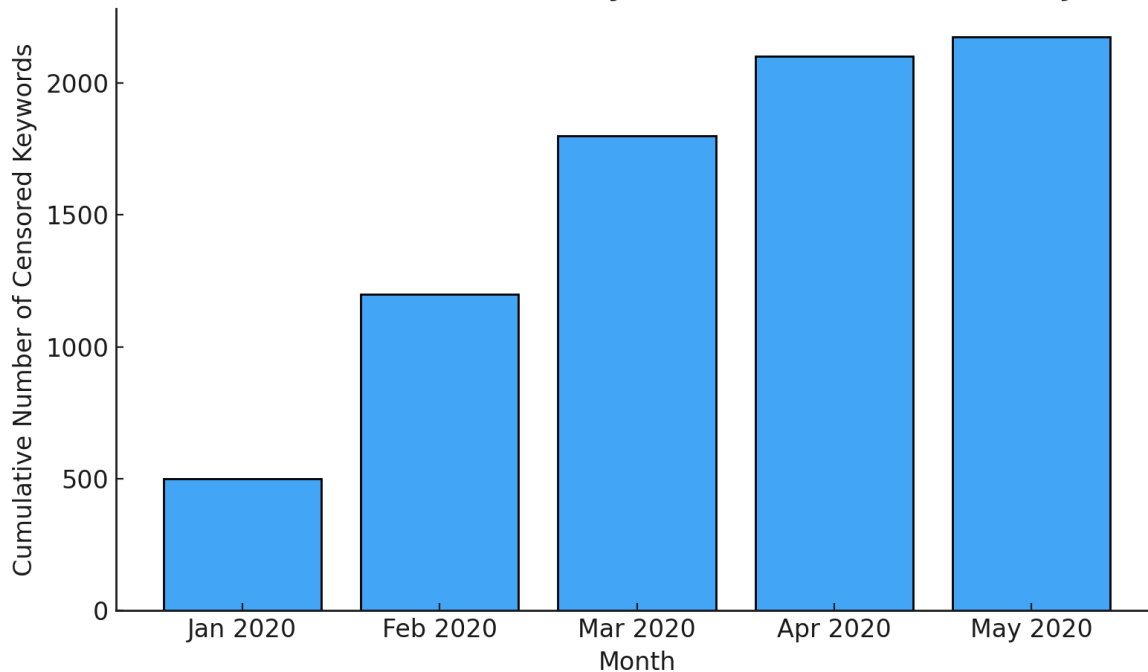


Figure 10: Cumulative COVID-19 related keywords censored on WeChat in China

Source: Author’s elaboration based on Citizen Lab, *Censored Contagion* (2020).

During the early months of the pandemic, Chinese platforms rapidly expanded censorship lists. As Figure 10 shows, the number of COVID-19–related keywords blocked on WeChat grew from around 500 in January 2020 to more than 2,100 by May 2020 (Citizen Lab, 2020). These data capture the initial censorship spike at the outbreak’s onset. Although Citizen Lab’s keyword testing ended in May 2020, subsequent reports by Human Rights Watch and China Digital Times confirm that censorship remained intense throughout 2021–2022, shifting from outbreak terms to topics such as vaccine safety, foreign criticism, and the “lab leak” debate. The expansion highlights how China relied on pre-existing censorship infrastructure to control online discourse, in contrast to India’s temporary shutdowns or Germany’s legally defined takedown mechanisms.

Category	Example Censored Terms
Disease references	“Coronavirus” (冠状病毒), “Unknown Wuhan Pneumonia” (不明原因武汉肺炎)
Government criticism	“Wuhan SARS” (武汉非典), “Xi Jinping + epidemic” (习近平 + 疫情)
Whistleblowers	“Li Wenliang” (李文亮), “Wuhan doctor” (武汉医生)
International bodies	“World Health Organization” (世界卫生组织), “WHO”

Table 3: Citizen Lab (2020), Censored Contagion & Censored Contagion II

Source: Own elaboration based on Citizen Lab (2020), Censored Contagion and Censored Contagion II.

While these examples illustrate the early censorship of COVID-19 discussions (Jan–May 2020), subsequent research has shown that restrictions evolved over time. In 2021 and 2022, censorship extended to vaccine-related debates, international criticism of China’s handling of the outbreak, and discussions around the “lab leak” hypothesis (Human Rights Watch, 2021; China Digital Times, 2022). This demonstrates how the Chinese model relied on long-term adaptive censorship rather than temporary emergency measures.

In sum, the three cases illustrate how regime type fundamentally shapes crisis communication logics. Germany’s liberal democratic framework prioritized transparency, legal accountability, and public trust, as reflected in its moderate but legally grounded takedown requests. India’s hybrid model blended democratic engagement with coercive tools such as internet shutdowns and regulatory takedowns, producing a fragmented yet adaptive response, as shown in the frequency of nationwide shutdowns during the pandemic years. China, by contrast, relied on centralized state authority and opaque domestic platforms to enforce a uniform narrative, demonstrated by the rapid expansion of censored keywords and the silencing of whistleblowers. These contrasts not only explain the quantitative differences highlighted in Chapter 3, but also underscore the evidence presented here in Chapter 4, setting the stage for examining how each government attempted to balance public safety with civil liberties in practice.

4.3 Balancing Public Safety and Civil Liberties

Building on these regime-specific approaches, every government struggled to protect public health without unduly suppressing free expression but with different outcomes.

Germany's approach combined stakeholder involvement in policy development with measured legal mandates and open content editing. This strategy reduced overreach and made it possible to remove clearly damaging material while maintaining open debate, an outcome mostly in line with scholarly debates for controlled but free digital discourse (Smith, 2024; Harasimowicz & Nowicka, 2023).

In India, fact-checking websites and IT rules advanced public safety objectives and supported accurate information, thus strengthening regulatory measures. Though meant to prevent communal violence, the sporadic internet shutdowns greatly hindered access to important health updates and sparked questions about too strong state control. Digital rights groups have attacked these closures as disproportionate, stressing the conflicts that result when emergency powers restrict civil liberties (Hussain et al., 2024).

China's strict censorship system suppressed dissent and enforced a consistent narrative, so it attained high degrees of compliance. These strategies reduced false information and promoted public health recommendations' adherence, but they did so at the price of free speech. The legal and punitive actions taken against those labeled "rumor-mongers" drew domestic and international criticism for erasing openness and trust in government and institutionalized fear and self-censorship (Brehm, 2021; Chen, 2025).

To illustrate these differences more concretely, Table 4 and Figure 11 compare how Germany, India, and China balanced public safety with civil liberties during the COVID-19 pandemic. The table provides a detailed breakdown of government measures and their consequences, while the scatterplot visually synthesizes these trade-offs, positioning each country according to the degree of liberty protection and public safety effectiveness. Together, these visuals demonstrate how regime type shaped not only the tools of crisis communication but also the normative balance each government struck between safeguarding health and preserving rights.

Country	Main Strategy	Public Safety Outcomes	Civil Liberties Impact	Overall Balance
Germany	Legal mandates (NetzDG), platform cooperation, fact-checking partnerships	Effective removal of harmful misinformation; maintained open debate	Strong safeguards through judicial oversight and civil society consultation	Proportionate, democratic balance
India	IT Rules, fact-checking initiatives, targeted internet shutdowns	Some success in curbing misinformation, but shutdowns disrupted vital services (health/education)	Restrictions criticized as disproportionate; weakened democratic accountability	Hybrid, fragmented balance
China	State media control, Great Firewall, real-time censorship, punitive measures	High compliance; rapid removal of misinformation	Extensive suppression of dissent; widespread self-censorship and fear	Authoritarian, restrictive balance

Table 4: Balancing Public Safety and Civil Liberties in Germany, India, and China

Source: Own elaboration based on Volk (2021); Islam (2024); Gao (2021); Brehm (2021); Chen (2025); Smith (2024); Harasimowicz & Nowicka (2023); Hussain et al. (2024).

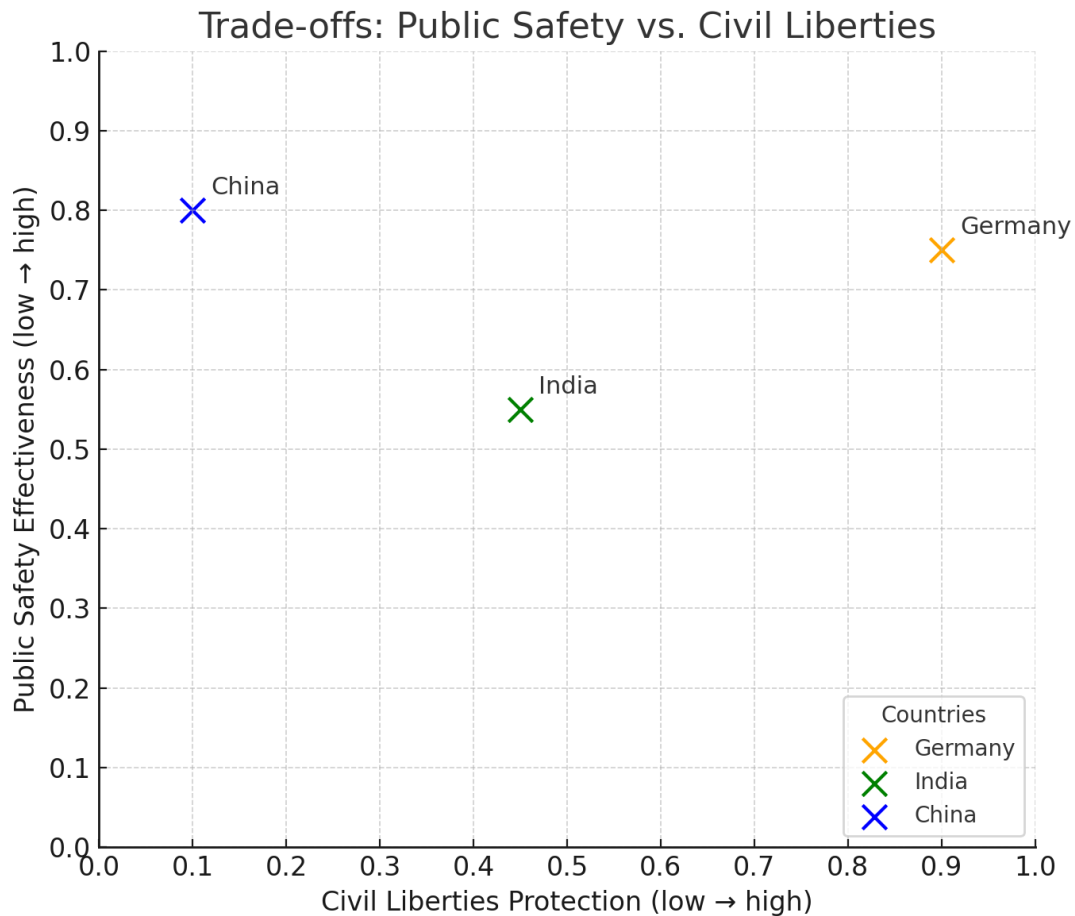


Figure 11: Trade-offs between public safety and civil liberties

Source: author's elaboration based on Volk (2021); Islam (2024); Gao (2021); Brehm (2021); Chen (2025); Smith (2024); Harasimowicz & Nowicka (2023); Hussain et al. (2024).

Taken together, Table 4 and Figure 11 highlight how regime type determines the willingness of governments to privilege either public safety or civil liberties during crises, a dynamic that directly informs the theoretical debates examined in the following section.

4.4 Implications for Crisis Communication Theory

The patterns visualized in Table 4 and Figure 11 also have direct implications for theory. Comparative data from these cases supports as well as refutes accepted wisdom. Germany's strategy supports the fundamental ideas of Situational Crisis Communication Theory (SCCT): transparent, credible messaging preserves trust without necessitating a full state of exception (Weiss, 2021; Coombs, 2010). The hybrid response of India shows the pragmatic application and possible normalizing of emergency powers defined in the state of exception framework, implying that current theory must better explain governments combining democratic and coercive elements (Margiansyah, 2022; Agamben, 2005). China's model supports digital authoritarianism theory by showing how thorough censorship and punitive actions stifle alternative narratives; yet it also emphasizes the need of theorists to take long-term public trust under such governments into account (Janjua et al., 2024).

Germany's experience demonstrates how SCCT functions most effectively in a high-trust, institutionalized environment. Transparent communication from authorities, combined with legally defined takedown frameworks such as the Network Enforcement Act, ensured that interventions against misinformation were conducted with judicial oversight and civil-society participation. Research shows that credibility and trust are central to effective crisis communication (Bickham & Francis, 2021; Fiske & Dupree, 2014; Li, 2020). As Figure 8 illustrates, Germany's takedown requests remained moderate and stable even during the pandemic years, reinforcing the idea that crises can be managed without resorting to exceptional powers. From a theoretical perspective, this confirms SCCT's claim that openness and credibility preserve public trust (Coombs, 2010; Frandsen & Johansen, 2011). However, scholars emphasize that trust is not automatic but rooted in institutional accessibility and perceived fairness (Schmidhuber et al., 2023; Jardine et al., 2013). Germany highlights an important boundary condition: SCCT assumes high baseline trust, which may not exist in weaker democracies. This suggests the need to refine SCCT by explicitly considering institutional preconditions.

India provides a more complex picture, especially when viewed through the lens of the “state of exception.” The large number of internet shutdowns recorded between 2018 and 2022, and particularly during the pandemic (Figure 9), shows how exceptional measures became routine instruments of governance. While SCCT would emphasize democratic engagement and credible communication, India’s response shows how governments can combine outreach and fact-checking with coercive measures that undermine access to information. This reflects Agamben’s (2005) argument that emergency powers often blur into ordinary governance, but India extends this logic: such measures were deployed within a formally democratic framework. Comparative research shows that public trust in government is highly sensitive to perceived fairness during crises (Han et al., 2011; Zhai et al., 2022). Case studies of Kerala illustrate how democratic engagement can enhance compliance (Sanjeev et al., 2021), yet India’s nationwide shutdowns normalized coercion, raising concerns about democratic backsliding. Scholars argue that hybrid regimes complicate theoretical binaries of democracy vs authoritarianism (Blitstein-Mishor et al., 2023; Zhang & Zhang, 2024). India demonstrates that current theory underestimates how hybrid regimes institutionalize emergency powers, suggesting the need to expand state of exception theory to account for democratic–authoritarian blends.

China’s authoritarian model aligns most closely with digital authoritarianism theory, which emphasizes how governments use censorship, surveillance, and punitive measures to dominate online discourse. Figure 10 shows the dramatic rise in censored keywords on WeChat in the first months of 2020, confirming the speed and scale of China’s censorship apparatus (Citizen Lab, 2020). This reflects digital authoritarianism’s core claim: the state’s ability to engineer online narratives through filtering and punishment. The case of Dr. Li Wenliang, reprimanded for “spreading rumors,” illustrates how censorship operates at both systemic and personal levels, generating fear and self-censorship. Empirical studies confirm that Chinese government communication on platforms like Weibo is closely linked to trust and compliance, but only when credibility is maintained (Ma & Christensen, 2018; Luo et al., 2023). In the short term, China’s approach fits digital authoritarianism theory by ensuring compliance and narrative control. However, evidence also shows crises like SARS and COVID can erode trust in the long term (Zhai et al., 2022). This suggests digital authoritarianism theory should not only explain efficiency in suppression but also account for legitimate costs.

Taken together, the three cases highlight the importance of regime type as a conditioning factor in crisis communication. Germany illustrates that liberal democracies can preserve both safety and liberty by embedding interventions in institutional frameworks. India demonstrates that hybrid regimes complicate theoretical binaries, borrowing tools from both democracies and authoritarian states. China underscores how authoritarian regimes achieve high compliance through censorship but risk undermining trust in the long term. Table 4 and Figure 11 visualize these trade-offs, showing how governments occupy different positions in balancing liberty and safety.

Theoretically, this analysis points to three refinements. First, SCCT must account for regime conditions: transparency works differently in consolidated democracies than in hybrid or authoritarian systems. Second, the state of exception framework should extend beyond temporary suspensions of rights to capture their normalization in hybrid contexts. Finally, digital authoritarianism theory needs to explain not only the short-term effectiveness of censorship but also its long-term consequences for legitimacy. Crisis communication cannot therefore be theorized apart from political systems; regime type must be integrated more explicitly into the discipline's models.

4.5 Lessons Learned and Policy Recommendations

Several best practices show up across all regimes. By including independent monitoring into content-moderation procedures and funding digital literacy to empower individuals, democratic systems can keep public trust (Kozyreva et al., 2023; Vesnic-Alujevic, 2021). To avoid the entrenchment of extraordinary powers, hybrid governments should reserve internet restrictions for narrowly defined emergencies along with clear transparency and sunset clauses to avoid the entrenchment of exceptional powers (Mufti, 2018; Middleton & Win, 2021). Without giving complete control, even authoritarian systems could embrace "controlled pluralism," bringing open, state-supervised fact-checking and publication of moderation criteria to support regime credibility (Neo, 2021; Xoma & Nikolaieva, 2022).

For democracies like Germany, these measures strengthen legitimacy and sustain trust through openness. For hybrid systems such as India, limiting shutdowns and embedding transparency

safeguards could prevent long-term erosion of democratic accountability. For authoritarian regimes such as China, carefully introducing controlled pluralism could enhance credibility without undermining centralized authority.

All governments should finally set up flexible laws that clearly outline how far emergency information controls can go and how they can be changed back, collaborate with technology platforms on effective moderation strategies, and encourage the use of international best practices to improve methods that adapt to evolving digital landscapes.

Conclusion

This thesis investigated how the political systems of Germany, India, and China affected their reactions to the COVID-19 infodemic. Although all three nations put policies in place to fight false information, content moderation, official messaging, and legislative systems, their approaches differed greatly depending on their political systems. Emphasizing openness, legal responsibility, and civil society involvement, Germany sought to strike a balance between the defense of free expression and the control of misinformation. India showed the paradox of a hybrid government by combining more forceful tools like focused internet shutdowns with democratic outreach, including fact-checking projects and public health campaigns. To keep narrative control and social stability, China centralized a top-down approach based on censorship, surveillance, and punitive enforcement.

The comparative analysis of quantitative indicators reinforced these contrasts. Germany's moderate but consistent use of legal takedown requests illustrated its procedural reliance on judicial oversight. India, by contrast, demonstrated the scale of its coercive instruments through thousands of takedown requests and frequent nationwide shutdowns, with sharp spikes during the pandemic years. China's strategy was less visible in international datasets but was revealed through the rapid growth of censored keywords on WeChat and the removal of sensitive content relating to whistleblowers, government criticism, and international organizations. Taken together, these data show how regime type is not only reflected in broad governance models but also in the concrete numbers and practices that shaped online information flow during the pandemic.

These examples show how governments prioritize legitimacy, order, and public confidence differently and confirm that regime type greatly affects crisis communication strategies. The results support current theoretical models in crisis communication and governance as well as emphasize the need to modify these ideas to fit hybrid governments and the long-term consequences of digital authoritarianism. This study provides a basis for the next studies that might investigate the long-lasting consequences of emergency information controls, the function of digital literacy, and the changing balance between public safety and civil liberties, despite being limited by its dependence on secondary data and contextual specificity. In times of crisis,

the management of false information reflects how governments define authority, responsibility, and the limits of free expression, transcending issues of public health and technology.

Beyond the specific case of the COVID-19 pandemic, the findings of this thesis suggest that crises tend to amplify pre-existing political and institutional dynamics rather than fundamentally transform them. The comparative analysis shows that approaches to misinformation governance are closely shaped by regime type, levels of institutional trust, and established norms surrounding freedom of expression. While all governments seek to limit the societal harm caused by misinformation, the tools they adopt and the limits they impose on civil liberties reflect deeper political logic rather than purely technical considerations. In this sense, the management of misinformation during crises emerges not only as a matter of public health or communication efficiency, but as a broader reflection of how power, legitimacy, and democratic values are negotiated under pressure.

Future pandemics or global crises will inevitably test these models again, making it crucial to monitor whether hybrid states normalize coercive measures, whether democracies maintain transparency under pressure, and whether authoritarian regimes face long-term trust erosion.

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