



Prospects of the Application of Algorithmic Lobbying as a Tool for Civil Society Influence on Public Policy Making

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Abstract

The purpose of the article. The article substantiates the role of algorithmic lobbying as a tool for influencing civil society on the development of state policy.

Results. The analysis of the possibilities of the influence of artificial intelligence on public decision-making and mechanisms of political interaction is carried out. The practices of algorithmic targeting in the elections in the USA, Brazil and India, as well as the role of large platforms "Facebook", "Google" and "X" in the formation of public opinion are considered. The risks and challenges associated with algorithmic influence on democracy, including lack of accountability, distortion of reality and positioning of the state as a "hostage" are investigated. Technologies. It has been established that lobbying algorithms mediate the interaction between citizens, the state and the information space, exerting an opaque and difficult to detect influence on political processes. It has been substantiated that the use of non-transparent algorithmic systems without appropriate legal regulation threatens to increase digital inequality, distort political competition and contribute to the violation of basic civil rights.

Conclusions. Recommendations on state regulation of algorithmic lobbying tools and practical proposals for Ukraine on democratic control over artificial intelligence technologies are provided. The need to ensure the transparency of algorithms (mandatory disclosure of the logic of the operation of models, which will be available to public authorities and citizens) and institutional control (creation of an independent supervisory body for algorithmic decisions with the involvement of experts in law, ethics, digital technologies and public administration). It is proposed to adopt regulations to ensure the transparency of the use of artificial intelligence algorithms.

Keywords: civil society, artificial intelligence, algorithmic lobbying, public administration, political influence, democracy, digital ethics, legal regulation, data manipulation, social networks, electoral technologies, digital governance, algorithmic targeting

Перспективи застосування алгоритмічного лобювання як інструменту впливу громадянського суспільства на вироблення державної політики

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Анотація

Досліджено особливості застосування проєктного підходу до формування цифрових громад в Україні в умовах реалізації Угоди про Мета статті. В статті обґрунтовано роль алгоритмічного лобювання як інструменту впливу громадянського суспільства на вироблення державної політики.

Результати. Здійснено аналіз можливостей впливу штучного інтелекту на прийняття державно-управлінських рішень та механізми політичної взаємодії. Розглядаються практики алгоритмічного таргетування на виборах у США, Бразилії та Індії, а також роль великих платформ «Facebook», «Google» та «X» у формуванні суспільної думки. Досліджено ризики та виклики, що пов'язані з алгоритмічним впливом на демократію, включаючи відсутність підзвітності, спотворення реальності та позиціонування держави як «заручника» технологій. Встановлено, що алгоритми лобювання опосередковують взаємодію між громадянами, державою та інформаційним простором, здійснюючи непрозорий та складно детектований вплив на політичні процеси. Обґрунтовано, що використання непрозорих алгоритмічних систем без відповідного правового регулювання загрожує посиленню цифрової нерівності, спотворенню політичної конкуренції та сприяє порушенню базових громадянських прав.

Висновки. Надано рекомендації щодо державного регулювання засобів алгоритмічного лобювання та практичні пропозиції для України щодо демократичного контролю за технологіями штучного інтелекту. Доведена необхідність забезпечення прозорості алгоритмів (обов'язкове розкриття логіки роботи моделей, яка буде доступною органам публічної влади та громадянам) та інституційного контролю (створення незалежного контролюючого органу за алгоритмічними рішеннями із залученням експертів з права, етики, цифрових технологій та публічного управління). Запропоновано ухвалити нормативні акти щодо забезпечення транспарентності застосування алгоритмів штучного інтелекту.

Ключові слова: громадянське суспільство, штучний інтелект, алгоритмічне лобювання, публічне управління, політичний вплив, демократія, цифрова етика, правова регуляція, маніпуляція даними, соціальні мережі, виборчі технології, цифрове врядування, алгоритмічне таргетування

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Introduction.

Problem statement. In the twenty-first century, the rapid development of digital technologies has fundamentally transformed decision-making mechanisms in public governance, expanding the range of actors influencing public policy. The phenomenon of artificial intelligence (hereinafter referred to as AI) deserves particular attention, as it is evolving from a technical analytical tool into an active participant in the political process. The application of algorithms in areas such as Big Data processing, citizen behavior prediction, targeted political advertising, and automated public service management is shaping a new reality in which algorithms exert an indirect yet systemic influence on the state. A growing concern is the increasing role of private corporations that own AI technologies in shaping public policy.

It is precisely at this intersection – between the state, the private sector, and digital algorithms – that the phenomenon of algorithmic lobbying emerges. This concerns the influence on public administration through data, recommendations, digital platforms, and analytical tools, which are not always transparent or subject to democratic oversight.

Thus, analyzing AI not only as a technology but as a potential political actor is highly relevant in the context of modern state transformation, digital sovereignty, and the preservation of democratic procedures.

The article employs an interdisciplinary approach that combines methods from political science, public administration theory, law, and digital technologies.

The primary methods used include:

- content analysis of cases and public policies in which AI is used (e.g., Cambridge Analytica, Google, Meta, Amazon algorithms);
- comparative analysis of approaches to AI regulation in different countries (specifically, the EU, the US, and China);
- critical discourse analysis of public statements and corporate political strategies in the field of artificial intelligence;
- a systems approach to evaluating interactions between technology companies, algorithms, government institutions, and citizens.

Analysis of research and publications. The conditions and characteristics of lobbying in public administration are reflected in the works of both Ukrainian and foreign scholars. In the classical sense, lobbying is an activity aimed at influencing decision-making processes in the public sector by non-governmental actors (businesses, civil society organizations, associations, etc.) to advance specific

interests (Nesterovich, 2010). In Western political theory, lobbying is considered a legitimate form of participation in the political process. Ukrainian researchers emphasize the need to regulate lobbying activities in the context of transparency and integrity in public governance. Among the main authors who have examined lobbying within governance systems are: David Truman (1951), who emphasized the role of interest groups in the democratic process, as well as R. Dahl (1974), who viewed lobbying as an integral part of pluralist democracy, and K. Moloney (2021), who highlights the transformation of lobbying in the era of digital communications.

R. Binns define algorithmic lobbying as a set of tools including microtargeting, bot-networks and automated content that affect the shaping of the political agenda and high-ranking officials by imposing AI-based recommendations and applying manipulative data analytics (Binns, 2017). The report of the Organization for Economic Co-operation and Development (OECD) emphasizes that such practices pose a threat to the transparency of public governance, as digital lobbying technologies are developing faster than the corresponding legal and regulatory frameworks (OECD, 2023).

According to the forecast of the American non-profit research organization RAND, algorithmic lobbying may eventually become a standard element of political interaction between the state and corporations resulting in the creation of new international ethical standards (Lempert, 2025). D. Kreiss and S. McGregor's study substantiates that automated communication systems are adaptable during digital campaigns in the U.S. aiming at achieving political effect that blurs the boundaries between the public engagement and technological manipulation (Kreiss, 2017). Therefore, L. Floridi and J. Cowls justifiably call for establishing clear ethical frameworks and accountability mechanisms for algorithms involved in lobbying the political processes (Floridi, 2022).

In the Ukrainian context, several scholars have made significant contributions to the study of lobbying and digital governance: algorithmic systems and their impact on social processes, focusing on behavioral modeling in terms of artificial intelligence, O. Karpenko examines the legal foundations for the application of regulated lobbying in public administration (Karpenko, 2011),

A. Puraite focuses primarily on understanding how the implementation of digital tools in the public sector and civil services correlates with the concept of algorithmic governance and how digitalization influences the effectiveness of management processes in the field of public administration (Pūraitė, 2020).



Given significant changes in the Ukrainian legislation, the research of algorithmic lobbying as a tool of influence in public administration is becoming increasingly relevant.

The goal of this article is to provide a scientific justification for the prospects of applying algorithmic lobbying as a tool for civil society influence on public policy making.

An outline of the main research material. With the advancement of digital technologies, traditional lobbying approaches are undergoing transformation – digital platforms and algorithmic systems are increasingly serving not only as communication channels but also as autonomous mechanisms of political influence.

The traditional model of the political process included three key groups of actors:

1. The State (Government, Parliament, Bureaucracy);
2. Economic Entities (Businesses, Financial Groups);
3. Civil Society (NGOs, Trade Unions, Activists).

Classical political theory views political actors as participants in the distribution of power and resources. In the digital era, this understanding expands significantly. According to the research of Sh. Zuboff (Zuboff, 2019), digital corporations do not only accumulate economic power but also political influence through data control and behavioral prediction.

B. Schneier, in his book «Data and Goliath» (Schneier, 2015), discusses algorithmic mediation, which is replacing traditional forms of public impact, designing a new reality where knowledge management tools (algorithms) carry more weight than democratic institutions.

These processes give rise to the phenomenon of «algorithmic sovereignty» (Reviglio, 2020). This occurs when states or even individual policymakers lose the ability to autonomously shape the agenda without the participation or approval of digital platforms.

The concept of «algorithmic governance» is gradually entering the discourse of public policy. In the research of M. Hildebrandt (Hildebrandt, 2020) it is argued that algorithms, which make or recommend decisions based on big data processing, create a new governance architecture – «by design», meaning pre-programmed from the outset. Other authors, in particular, F. Pasquale (Pasquale, 2015), emphasize the opacity of algorithms used in security, healthcare, finance, and increasingly in the public sector.

In the European context, debates around the AI Act proposed by the European Commission in 2021

have been ongoing for several years (EU Artificial Intelligence Act, 2024). The AI Act establishes risk levels for AI applications, particularly in administration, justice, and law enforcement. At the EU policy level, algorithms are increasingly viewed as structural factors influencing state governance.

In Ukraine, systematic analysis of AI as a political actor is still lacking, but there are isolated efforts to address this issue. Projects such as «Diiia», eMaliatko, and eZvernennia demonstrate elements of automated decision-making, integrating AI-driven administrative processes to improve efficiency and accessibility. However, the public discourse remains largely focused on convenience rather than the broader political implications of AI governance.

Algorithmic lobbying is a new form of political influence, facilitated by such digital technologies as systems of artificial intelligence, big data analytics, and algorithms capable of modifying information flows, shaping public opinion, and affecting decision-making in public administration.

Unlike traditional forms of lobbying, which involve direct interaction between interest groups and governmental representatives (meetings, proposals, informal communications), algorithmic lobbying operates indirectly—through a digital architecture of influence: recommendation systems, data manipulation, personalized information, and social media.

According to K. Young (Yeung, 2017), algorithms play an increasingly essential role in «soft governance» of behaviour, where control is not based on coercion but rather on technological guidance of choice through the digital environment.

The main mechanisms of algorithmic influence include:

1. Algorithmic selection of information which plays a crucial role in shaping user perception. Platforms utilizing AI – Meta, Google, X/Twitter, TikTok – determine what content users see, creating filter bubbles and resonance effects that can be leveraged for political mobilization or manipulation. During the 2016 U.S. elections, algorithmic promotion of political content on Facebook significantly influenced electoral dynamics (Tufekci, 2015).

2. Data-driven microtargeting that enables companies to individually target citizens based on their online behaviour, influencing political preferences and public opinion. A well-known example is the Cambridge Analytica scandal, where data from over 87 million Facebook users was exploited to create psychological voter profiles (Isaak, 2018)].

3. Automated recommendations for governments. IT systems are increasingly framed as «neutral analytics», offering efficient data processing



for decision-making in security, healthcare, urban planning, and social policy. However, such systems are often developed by private corporations with their own interests. For example, in 2021, the Dutch government was forced to abandon the automated fraud detection system «SyRI» after the court ruled it non-transparent and discriminatory (Kayser-Bril, 2021).

4. Standardization of «neutral» knowledge. Companies that own AI tools simultaneously shape technical standards for evaluating the effectiveness of decisions. This enables private entities to indirectly influence state regulatory processes, effectively defining what constitutes «normal» or «optimal» governance. Google, in collaboration with the European Commission, funded AI research for public services. The results of this research were later included into expert reports on AI regulation.

Algorithmic lobbying is carried out not only by technology companies but also through influence networks that include corporate consultants such as Accenture, Palantir, and McKinsey, Industry associations, for example, DigitalEurope which actively influences EU AI policy, independent research centers funded by IT giants, such as the Center for Humane Technology.

Corporate Europe Observatory's research (The lobby network, 2021) indicates that in 2021, technology companies spent over €97 million lobbying the European Union, with a significant portion allocated to digital regulation.

Algorithmic lobbying poses a significant threat to transparency, accountability, and inclusivity in public governance. Its primary danger lies in its covert influence on decision-making processes, occurring outside traditional political arenas and democratic oversight mechanisms.

First, algorithmic influence is largely invisible to most citizens because it operates through digital platform infrastructures that lack explicit political positioning and are perceived primarily as technical or commercial tools. Algorithmic recommendations effectively become de facto political decisions while remaining outside public scrutiny.

Second, algorithmic lobbying operates beyond existing anti-corruption and lobbying regulations because it does not imply direct intervention in the political process through physical agents or traditional political intermediaries. Instead, influence is exerted through Big Data, personalized targeting campaigns, and automated decision-making systems.

Third, this form of influence distorts political competition, favoring actors with access to vast behavioral data and advanced algorithmic tools. It

leads to a new type of informational asymmetry, where political resources are no longer concentrated within state institutions or civil society but instead within private digital platforms and multinational tech corporations.

Forth, the emergence of such processes creates conditions for «digital neocolonialism», where states – especially those with limited technical capacity – become dependent on decisions proposed or implemented by commercial algorithmic systems developed outside their jurisdiction.

The issue of algorithmic responsibility and transparency is particularly critical. One of the defining characteristics of modern AI models is the «black box» phenomenon, where the decision-making logic is difficult to interpret, not only for external observers but even for the developers themselves. It complicates accountability for errors, biases, or manipulations in AI systems influencing public policy and societal processes. A striking example is the COMPAS system, used in the U.S. to predict criminal recidivism rates. Investigations revealed that the algorithm was biased against African Americans. However, no official body could fully explain how it functions (Angwin, 2016).

One of the most concerning aspects of algorithmic lobbying is its deliberate influence on public sentiment through social media. This includes:

1. Emotional narrative formation. It involves creating content designed to evoke strong emotional reactions, often to intensify societal polarization.

2. Creating the illusion of support for certain ideas. It relies on bot networks and astroturfing to simulate mass approval or opposition to political positions.

3. Psychographic microtargeting. It applies personality trait analysis to personalize political influence based on individual user political orientation.

Research from the Oxford Internet Institute (Industrialized Disinformation, 2020) confirms that organized digital disinformation campaigns with political objectives have been documented in 81 countries. These campaigns are often conducted by both government actors and private firms specializing in public opinion manipulation via social media. Algorithms do not only reflect existing political biases but also create new forms of exclusion and manipulation (O'Neil, 2016).

Conclusions and prospects of further research. It has been proven that AI, particularly its algorithmic applications in digital communication, is increasingly performing functions inherent to political actors: influencing agenda-setting, policy priority determination, and citizen behavior. This necessi-



tates a reconsideration of traditional approaches to the concept of «political action» in the context of algorithmic governance.

It has been determined that algorithms mediate interactions between citizens, the state, and the information space, exerting an opaque and difficult-to-detect influence on political processes. The absence of a legislative definition of «algorithmic lobbying» leads to a situation where democratic control mechanisms lose their effectiveness.

It has been substantiated that the use of opaque algorithmic systems without appropriate regulatory oversight poses a threat of increasing digital inequality, distorting transparent political competition, and contributing to the violation of fundamental civil rights.

It has been established that, in response to the challenges posed by the algorithmic influence of artificial intelligence on the public administration system, it is necessary to ensure the development of a multi-level system of state regulation, which includes:

1. Algorithm transparency – mandatory disclosure of model logic (explainability), ensuring accessibility for both public authorities and citizens.

2. Institutional oversight – establishing an independent supervisory body for algorithmic decisions, similar to Data Protection Authorities (DPA) in the EU, with the involvement of experts in law, ethics, digital technologies, and public administration.

3. Ensuring ethical accountability – obligation for entities applying algorithmic lobbying to adhere to principles of fairness, non-discrimination, and social responsibility in data processing.

4. International harmonization of standards – given the global nature of algorithms, it is necessary to formulate universally recognized requirements to restrict algorithmic lobbying in public authorities. A relevant example is the Artificial Intelligence Act in the EU.

It is noted that Ukraine, as a country with a high level of digitalization and an ambitious strategy for implementing artificial intelligence in public administration, must act proactively. It is recommended to prioritize the adoption of regulatory acts ensuring the transparency of AI algorithm applications (similar to GDPR and DSA in the EU). Further research should focus on the feasibility of applying a “right to opt-out” mechanism for algorithmic personalization, particularly in political advertising and news feeds.

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