Political Ideologies and Surveillance Culture in Biosecuritisation During COVID-19

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Declaration of Authorship

I hereby declare that this thesis is my own work. Some parts, such as the Chinese text translation, are assisted by software to achieve better results in Chinese-English translation, particularly for interpreting official clichés and bureaucratic expressions.

Abstract

Due to the global impact of COVID-19, many governments adopted digital tools to manage the pandemic. These technologies signal a great trend within biosecuritisation, in which public health threats are presented as security risks and justify new forms of intervention. This thesis investigates the cultural and political dynamics of biosecuritisation by examining how biosecuritised actions, such as digital contact-tracers, vaccine passports, and lockdown were promoted during the pandemic.

Using China and the UK as case studies for authoritarian and liberal-democratic governance, this study examines official discourse surrounding China's Health Code System (HCS) and the UK's NHS COVID-19 app (NCA). Drawing on an integrated Pragmatic Discourse Analysis (PDA) with Critical Discourse Analysis (CDA) enhanced by a Discourse Historical Approach (DHA) framework, the thesis aims to investigate argumentation strategies, relations of power and ideological assumptions embedded in government communication.

The findings indicate that the two countries both conceptualised surveillance technology as protecting public health and collective responsibility, yet their methods of legitimation were different. In the UK, surveillance was minimised in terms of voluntariness, privacy rights and trust, and such language reflected liberal concerns with state overreach and limiting the app's potential role in pandemic governance. In contrast, centralised authority, collectivist belief and a normalised surveillance culture developed in China provided the conditions for implementation to be both forced and extensively infrastructural integrated, though this approach also resulted in trust gaps and human rights abuses later on.

Overall, this research shows that political ideology and surveillance culture mediate the communication, normalisation, and contestation of biosecuritisation and its impact on digital tool design and its social impact during public health emergencies.

Access Condition and Agreement

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Chapter 1 – Introduction

In October 2020, deaths from this virus daily globally ranged between 4,000 and 6,000, and the death toll exceeded one million (Albert et al., 2021). This disease was also known as coronavirus disease 2019, which led to the global COVID-19 pandemic and required government and technology companies to develop digital solutions in order to limit disease transmission in an efficient manner. Because of an urgent demand to track infections in real-time, the prevalence of surveillance technologies increased rapidly (Roberts, 2020). Technologies such as sharing data platforms between technology corporations, Bluetooth tracking apps, facial recognition cameras with thermal screening, and immunity passports (Pegoraro, 2020) are among these approaches.

1.1 The Rise of Surveillance in Biosecuritisation During COVID-19 Pandemic

Biosecuritisation is defined as when health concerns, such as infectious diseases, are presented as security risks that require exceptional measures, often involving the restriction of freedoms and/or increased state surveillance (Albert et al., 2021). Historically, there was an understanding of security threats in the context of conventional warfare and terrorism with an orientation towards state and non-state actors like ISIS, al-Qaeda, and the Taliban (Albert et al., 2021). The first emergence on a global basis of identifying infectious disease as a security threat was made in 2000, when the UN Security Council declared HIV/AIDS a threat to international peace and security in Africa, followed by the United States administration's recognition of the disease as a national security threat (Butler, 2014, p. 469).

Since its outbreak, the COVID-19 pandemic has triggered a new wave of biosecuritisation. The virus has been framed as a security issue and extreme measures were thought to be necessary to ensure public health and maintain social stability. One noticeable trend is that the use of surveillance technologies in digital solutions for limiting virus transmission has largely increased. In China, the HCS and supportive devices integrated with facial recognition and Artificial Intelligence (AI) were used to track and collect personal information such as travel history, health status, and contact with infected individuals, and this information was shared with authorities (Zeng, 2020). The UK government also adopted surveillance as a part of its biosecuritisation strategy. However, its form and intrusive features were more limited by democratic process and concerns over civil liberties. The NCA used Bluetooth technology to notify individuals if they had been in contact with someone who

tested positive for the virus. Unlike China's system, this digital tool was decentralised to anonymise data and protect individual privacy (White, 2021).

The utilisation of such digital and biometric surveillance technologies has inevitably put individual liberty and privacy rights at an unprecedented risk. To address these issues, governments and health authorities actively sought acceptable reasons to justify their implementation of pandemic control technologies with significant surveillance characteristics, and the tracking modes were specifically designed to gain public support and trust. For example, in the UK, the NCA was framed as a voluntary use health-protective tool with a sophisticatedly designed privacy protection framework. In China, the government and state media organisations justified surveillance features in the HCS as an advanced digital solution built upon the country's matured big data systems for precisely controlling risk populations that can both ensure normal economic activities and collective safety.

1.2 Research Motivation and Background

Since the first wave of the COVID-19 pandemic hit the UK in March 2020, excess mortality across the country has dramatically increased in April, with 9,500 out of 13,000 caused by the infection (BBC, 2023). On 16 March, former UK Prime Minister Boris Johnson stated, "Now is the time for everyone to stop non-essential contact and travel". A week later, followed by the royal assent of the *Coronavirus Act 2020*, the first nationwide lockdown was announced on 23 March and legally came into force on 26 March (IfG, 2022). The UK government's rapid response to the pandemic also accompanied an initial plan for a digital contact tracing app by NHSX, which drew my attention to considering a global trend of utilising surveillance technologies in managing health crises.

Digital and biometric surveillance technologies, including big data analysis, GPS location tracking, thermal screening, and facial recognition, were adopted in the design and development of China's HCS in February 2020. This integrated system acts as a mass surveillance tool for the Chinese government to control the population precisely, while a collective moral effort to use this system was required to maximise its capacity. The Chinese Communist Party (CCP) government certainly exercised its authoritarian power, turning the use of this system into a mandatory requirement and corresponding legal frameworks were established to punish noncompliance.

When I initially noticed the NHSX's plan to develop the digital contact tracer in April 2020, the UK Biometric Commissioner, who operates independently from the government and is

responsible for overseeing and assessing how the police handle and retain DNA information and fingerprints, wrote a statement on the use of upcoming digital solutions (Gov.uk, 2016). In this statement, he noted that these digital tools, which may include biometric features, align with the form of surveillance used in policing that must be regulated by Parliament and backed by emergency legislation. The smartphone application, in its planning phase, was proposed to have a centralised matching system that works on a computer server to alert people when nearby positive cases are detected (Hern, 2020). This surveillance mode raised my concerns about the potential challenge to privacy and individual rights in the UK as a liberal democratic country.

The formal version, which was launched across England and Wales in September 2020, does not operate on a centralised platform as the UK government scrapped the initial plan under criticism from multiple aspects (ORG, 2020). The decentralised mode minimises data and privacy intrusion, and all exposure notifications only happen on individual devices (DHSC, 2021, p. 21). Meanwhile, official announcements and relevant explanatory documents regarding the smartphone application explicitly emphasised privacy protection, voluntariness, and individual rights in the use of this application. This cautiousness contrasts with the Chinese government's rationalisation of mass surveillance activities, which portrayed the HCS as an essential approach for pandemic control while collective efforts were required.

Although it is easy to understand that cultural and political factors can result in these differences, I was still interested in how cultural values and political ideologies shape political communications to surveillance technologies and official narratives to convince or urge citizens to comply with the use of such tools. Therefore, my thesis presents findings from an investigation into how governments promote digital and biometric surveillance for pandemic control in different cultural and political contexts.

The study used two main methods: Pragmatic-Dialectic Analysis (PDA) and Critical Discourse Analysis (CDA). CDA was applied through the Discourse-Historical Approach (DHA). These methods were used to examine how China and the UK promoted advanced surveillance technologies during the COVID-19 pandemic. The analysis focused on how political ideologies and social values shaped how these technologies were explained and justified to the public. Specifically, this research compared the contrasting approaches of these two countries in deploying technologies such as contact tracking apps, facial recognition, and biometric monitoring, analysing how their political systems

(authoritarianism in China and liberal democracy in the UK) shaped official discourse, policy formation, and the legal justifications for biosecuritisation measures.

This thesis accomplished two aims on the basis of an analysis of the crossroads of state power, public health institutions and individual rights: 1) Evaluating the way on the part of the UK's liberal democratic government navigates this tension between protecting national security and protecting individual liberties. 2) Evaluating how China's authoritarian regime adopted a top-down style of communication and collectivistic narratives that led citizens to passively accept the HCS. Meanwhile, I am looking into how these technologies were promoted by considering cultural values, public views on privacy, and the level of trust people have in their governments. This comparison reveals some interesting differences: in China, the government's centralised approach justified widespread surveillance by prioritising collective safety. In contrast, the UK's decentralised model focused on encouraging voluntary participation and protecting privacy to help build and maintain public trust.

Interestingly, certain counter-intuitive results are indicative that the UK government had also deployed strong authoritarian power in crisis management and that a collectivistic communication style was applied when calling for the public to participate in the human-operated test and trace programme. These authoritarian and collectivistic tendencies were nonetheless displayed by fewer or none of the official speeches and documents in support of the NCA. This is indicative of the British government's intent to safeguard privacy and preserve voluntariness in the application of digital surveillance. In China's case, one official interview regarding the discussion of privacy issues in the use of the Suishenma system (the local version of the HCS in Shanghai) indicates a different standard of privacy concept among Chinese citizens. Through the DHA evaluation, I found that this difference is can be attributed to China's unique cultural context, such as Confucian thoughts and a negative definition of "privacy" in its linguistic culture.

Ultimately, the research will contribute to a broader understanding of how culture and political ideologies shape the framing of surveillance in response to global health crises, offering insight into the future trajectory of biosecurity governance in an increasingly digitised world. Through this comparative effort, the study also critically evaluated whether the pandemic has accelerated the normalisation of surveillance as a tool for governance, and

what implications this may have for future political and civil liberties in both democratic and authoritarian states.

1.3 Academic Field and Discipline

To address the central research question: "How have digital and biometric surveillance tools been promoted and justified during the COVID-19 crisis?" I draw on multiple academic insights from political communications and surveillance cultural studies to explore cultural-political and ideological influences in the implementation and promotion of these tools. Therefore, this thesis is mainly located in and contributes to the academic field of these two disciplines. Focusing on these two disciplines offers critical frameworks for understanding how cultural and political factors shape the practice of surveillance. The agenda-setting theory and framing theory, as two classic political communication theories, help understand how governments strategically convey the necessity of developing and implementing surveillance tools in public crises. Foucault's governmentality and panopticism provide the conceptual framework for critical evaluation for this study to evaluate communication strategies the governments used in setting the agendas.

Agenda-setting and framing theory are two essential concepts in communication studies that explain how issues gain public attention and how they are presented to shape perceptions. These theories are helpful for understanding my central research question, which is purposed to investigate the official discourses influenced by cultural and ideological factors in the promotion of digital and biometric contact tracing tools. Agenda-setting theory is known as a communication theory that describes the ability of the news media to influence the importance placed on the topics of the public agenda. In the process of setting the agenda, policymakers do not tell people what to think; instead, they tell people what to think about. It guides public attention by focusing on specific topics, leading them to regard those issues as necessary. To be exact, this theory explains that public agendas are shaped by media as specific topics and their attributes are emphasised through repeated coverage (McCombs, 2001). The framing theory takes the agenda-setting process a step further by explaining how issues are presented. McCombs (1997, p. 37) suggests that, in the context of second-level agenda setting, framing involves choosing a limited set of attributes that are thematically connected to be highlighted on the media agenda when a specific issue is covered.

In the meantime, "news values" specify an earlier step of that process: the logics of selection that underlie which events and angles become reportable and repeatable in the first place.

Classic work by Galtung and Ruge (1965) identifies negativity, threshold, proximity, unambiguity, continuity, and reference to elite persons or nations as factors that increase the likelihood of issues being selected as news. In pandemic coverage, such values can elevate accounts of risk, controversy, enforcement, and high-stakes failure, and they can keep attention locked on rolling updates through continuity. This is relevant to this thesis, since it explains why official messages often seem to anticipate and influence the media-mediated reception by highlighting particular traits which survive well under selection pressures (e.g., safety, responsibility, legality, and trust (Harcup and O'Neill, 2001; Harcup and O'Neill, 2017).

For example, government and institutional communications in the UK repeatedly portrayed the app as an instrument with a carefully designed privacy protection framework that serves to maintain public health, not to monitor individual movements, but as a proportionate response in the face of virus transmission. This framing reflects prevailing news values like unambiguity, relevance and elite reference, which makes official pledges about legality and privacy relatively straightforward to document and circulate without engendering discord. Conversely, the Chinese authorities repeatedly emphasised how the HCS monitors individual movements and health status and linked that to social stability, collective security and quick crisis resolution. News values such as threshold, continuity, and national significance underpin narratives of scale, urgency, and success that sustain focus around mobilisation and control results. In both, news values help to organise what characteristics of surveillance technologies come to be understood as salient and legitimate in public discourses and how biosecuritisation becomes framed and approved. Cultural studies offer a theoretical foundation to investigate cultural norms and ideologies that influence the practical forms of surveillance technologies.

Within the theoretical framework, I used CDA to investigate cultural-historical influences to achieve a better understanding of how surveillance practices in different cultural and political contexts are justified within specific historical and political contexts. Lyon (2018) stresses the integral role that surveillance has in the cultural fabric of societies and that surveillance is embedded in societies with a long-standing relationship to their culture. He proposes that surveillance practices reflect a country's historical models of governance, social norms, and power structures (Lyon, 2018). For instance, in liberal democratic countries like the UK, mass surveillance is frequently portrayed as a function of public safety. This is due to the country's cultural tradition, which has evolved in a sequence of political and economic

transformations that includes the introduction of the Magna Carta, the birth of representative government, and the process of capitalisation. In authoritarian settings like China, surveillance is presented as the necessary means to protect and exert control over the state, with less justification. The theory is believed to emanate from its legacy of governmental practice and social construction, one of the main strands of the Confucian hierarchy, which posits that government officials share responsibility for disciplining citizens similarly as parents discipline children.

Foucault's ideas of governmentality and panopticism are not exclusively reserved for cultural studies, but they have greatly aided the study of power and surveillance dynamics. They helped me examine the practical nature of surveillance within contemporary power arrangements and the impact of cultural-ideological norms on official discourses to use surveillance measures. Governmentality is when the state controls the population through institutions, policies and activities that direct the behaviour of individuals instead of via brute force (Gordon, 1991, p. 2-3). For Foucault, direct coercion is less effective in current governance. Population management revolves more around knowledge, regulations, and technologies (Gordon, 1991, p. 3).

For instance, the UK's NCA app had a less authoritarian design than China's HCS. I did find that it works according to the logic of governmentality. This smartphone app requested citizen participation in contact tracing by asking for proximity monitoring. Under the UK's liberal democratic context, official discourses framed the use of this digital tool as voluntary and consistently underlined the fact that the tracking target is "the virus, not people." Such users have also been urged to exercise a moderate form of self-surveillance, and the fear of supervision by authorities was minimised. China's HCS is an illustration of governmentality in action. It tags people with the codes of colour coded (green, yellow or red) determine freedom of movement.

1.4 Existing knowledge

As introduced above, the COVID-19 outbreak encouraged governments and technology corporations to employ sophisticated surveillance systems for pandemic control. My research further narrowed down the area, focusing on biosecuritisation in social control during the COVID-19 outbreak, to study to what extent political and surveillance culture in China and Britain have influenced the promotion of such technologies. The term biosecuritisation in the context of this project refers to "the securitisation of life", which is applied in infectious

disease surveillance conducted by governments and third parties (Warren, 2013, p. 1; Papadopoulos, 2015, p. 9). French and Monahan (2011) found that surveillance plays a vital role in measuring, tracking, predicting, and regulating bodies and pathogens. Wienroth et al. (2020) indicate that biosecuritisation is developing fast while public health emergencies have been repurposed as security threats. Policymakers and governments tend to describe the control of contagion as dealing with security problems, so the actions that may cause privacy and liberty issues can be justified (Wienroth et al, 2020).

Governments' use of phone monitoring, contact-tracing apps, and facial recognition cameras could become a threat to civil rights. Recent studies have noticed that biometric digital solutions adopted in pandemic control are being re-appropriated to introduce and increasingly normalised as well as the prevailing biosurveillance in addressing security issues (Wienroth et al, 2020; Abergel and Magnusson, 2014, p. 6). Surveillance technologies in disease control have been justified through fear-based communication that people who are sceptical of surveillance would be distracted (Wienroth, et al, 2020). Scholars also found that countries which commonly share the values of individualism are more likely to use hostile framings of the pandemic, while other countries prefer to call for unity and collective action, such as Liberia or China (Wienroth, et al, 2020; Davenport, et al, 2020).

1.5 Academic Gap and Contribution

So far, there have been a few academic works examining contemporary mass surveillance in China and modern-day Britain, and they rarely look at the current situation from a perspective of cultural politics to discover ideological factors behind surveillance cultures. There is also a gap in academic research involving a blank in academic research comparing surveillance practices in pandemic control between different cultural and political systems. Therefore, my research project studied the situation in China and Britain in order to reveal how ideology and cultural paradigms are utilised in communication to persuade the public to accept surveillance techniques.

In order to demonstrate how ideology and cultural paradigms are worked into communication to convince the public to accept surveillance protocols, my research examined the circumstances of China and the UK. Existing academic research has typically found legal issues surrounding the practice of surveillance in Britain. The British intelligence service GCHQ (Government Communications Headquarters), for example, has been found to have violated the European Convention on Human Rights (ECHR) on account of having monitored Internet users and intercepted their messages (Schaar, 2018: 63; Akdeniz et al., 2000: 4). Public adoption of new surveillance technologies has also been studied. Bradford et al. (2020) show that 50/50 local participants in London accept and/or do not accept the use of live facial recognition by London police and conclude that trust and legitimacy may help to create public support for the use of new technology by police.

Comparative research with the Chinese context often relates to humanitarian and democratic concerns involved in surveillance practice. One comparison of quarantine surveillance mobile applications during COVID-19 in China and South Korea indicates how the surveillance infrastructure differs between the two countries. It shows that the HCS targeted a large scale of people in an omnipresent and compulsory manner, and it is built on the surveillance infrastructure of a non-governmental technology company Alipay, while in South Korea, only those who were recommended self-isolation were invited to install the app developed by the government (Kim, et al., 2020, p. 3).

Various other works in this regard for the Western context have primarily concentrated on the legal aspect of surveillance products and how digital surveillance has been an increasingly lucrative industry under a neoliberal form of rule (Fuchs, 2013). Subsequent studies and the existing literature surrounding the digital and biometric surveillance space have revealed key insights on legal principles, technical designs, and privacy protections. For instance, the study of contact tracing apps has examined data protection measures such as data protection, proportionality and compliance with regulatory regimes such as the GDPR (Morley et al., 2020; EDPB, 2020). Another example is that in the case of the NCA, technical studies have explored the system's effectiveness, accuracy and epidemiological impact (Wymant et al., 2021). Previous data on platform governance and design constraints suggest how operating systems and developer standards shape what kinds of surveillance are and are not technologically feasible (PHII, 2020). Regulatory and constitutional challenges regarding China's HCS have also been covered in legal scholarship with respect to legality, accountability, and rights protection (Zhang, 2022).

Although these bodies of work lay essential groundwork for this research, few scholars have examined how political ideologies, cultural traditions, and communicative strategies work together to legitimate surveillance in governance contexts. This study builds on the literature on political communication and surveillance culture by demonstrating how cultural and ideological framing enables surveillance to be both encouraged and validated during public health emergencies. This thesis fills that gap by taking a comparative view of China and the UK. The thesis does not position surveillance technologies as the inevitable result of pure cultural or political factors. Instead, it shows the ways that surveillance practices and cultural-political meanings intersect and are co-constructed through discourse. This approach highlights how responsibility, security, privacy and collective good are mobilised differently in official documents and how these differences play out with regard to general public attitudes to and commitment to biosecuritisation interventions.

Moreover, the research contributes towards the recent trends in biosecuritisation by contextualising pandemic surveillance at a historical scale of health governance and security responses to risk. It also implies that COVID-19 did not introduce a totally different logic of surveillance, but rather augmented existing forms of framing health emergencies as security-related concerns.

1.6 Theoretical Foundation

Given the complexity of the topics at hand, it is vital to have a clear theoretical framework to guide the overarching conceptual understanding of this project. Therefore, I take Deleuze's theory of a control society as a theoretical base. In today's world, the power has shifted from a system of punishment to a society of control, especially in a digital era in which control systems are significantly improved by combining with advanced technologies such as biometric identification and the Internet of Things (IoT) (Deleuze, 1992; Williams, 2015). In a control society power becomes embodied by flexible digital systems that can modulate their effects to achieve dynamic end results (Deleuze, 1992).

In further theorisation with Foucault's notion of governmentality, this research investigated how governments make use of technologies not only for the purpose of exercising control but also for the purpose of administering life itself. Biopolitics, according to Foucault, articulates the state's right to control a population, bringing into focus the administration of life and the body through political technologies of health and identity (Wallenstein, 2013, p. 35-52). The latter combines with governmentality, understood as the conduct of conduct at a distance, and integrates both surveillance and data-driven technologies required to navigate the contours of public health and social security. This expanded my understanding of how digital tools embody power relations.

1.6.1 China's HCS and the UK's NCA: Tools for Citizen control

Modern computation, positioning, and mobile phone technology make the capability of tracking device owners more efficient than ever. This feature can be utilised as a tool of citizen control during the COVID-19 crisis. For example, the HCS developed by the Chinese government and Alipay acts as an indicator to show users colours based on their health status and travel history: A red code means the user is a confirmed COVID-19 case and should be in quarantine, while a yellow code identifies a suspected case that should be staying in home (Davidson, 2020). These colours are also determined by the travel history of the holder (Davidson, 2020).

The UK's NCA, developed by the NHS, was designed to continuously track users' proximity to one another using Bluetooth, monitoring their interactions with others in real-time (Gov.uk, 2022). This continuous data collection represents Deleuze's idea of modulation rather than confinement. Through this, users were subjected to constant monitoring, with behaviours being regulated by the app's notifications about potential exposure to COVID-19.

According to Deleuze (1992, p,3), his friend Félix Guattari imagined a city where:

"one would be able to leave one's apartment, one's street, one's neighbourhood, thanks to one's (dividual) electronic card that raises a given barrier; but the card could just as easily be rejected on a given day or between certain hours; what counts is not the barrier but the computer that tracks each person's position--licit or illicit--and effects a universal modulation".

The theory of a control society hence aligns the current situation to a large degree, specifically for China as a society under an authoritarian system with a highly developed surveillance network. It inspires me to take a deeper insight from an empirical perspective to seek how a society of control is formed under different cultural and political contexts.

1.7 Chapter Outline and Functions

This section outlines the thesis structure and introduces the functions of each chapter.

Chapter 2 - Biometrics and Big Data in State Surveillance provides an overview for understanding the development of surveillance technologies from eugenics and racial sciences in Europe as an early form of biometric surveillance, the household or residential registration system (Huji) in China, which largely influenced later state surveillance practices, to modern technologies adopted in state surveillance for anti-terrorism or maintain social stability. Then, it introduces the role digital and biometric surveillance played amid the COVID-19 pandemic in China and the UK.

Chapter 3 - Conceptual Framework identifies and explains what is *culture* in the specific context of this thesis. This chapter identifies and defines the major concepts that are central to my research. I explain the UK's individualistic culture and China's collectivistic culture as representative cultural paradigms of each country. Foucauldian concepts on surveillance, including the theory of govermentality and biopolitics and Deleuze's society of control, are introduced as classic theories that have predicted the forms of surveillance today. Communication theories, including agenda-setting and framing, are explained as a key theoretical foundation for later discourse analysis. Then, I explain the role of political and surveillance culture in the digital era.

Chapter 4 - Political Culture, Privacy Concepts and Surveillance Practice: A Historical Overview looks at how historical factors influenced the political culture of each country and how privacy concepts were formed that are necessary for the PDA and CDA. This chapter

finds that the political and surveillance cultures in the UK and China are deeply influenced by their respective historical developments and cultural values.

Chapter 5 - Methodology explains how I use PDA and CDA to analyse sampled discourses and discover the functions of political ideologies and social values in the promotion of digital solutions for pandemic control.

Chapter 6 to *Chapter 9* analyse the sampled texts by using PDA and CDA.

In *Chapter 6*, I use PDA to analyse the UK corpus and identify the following rhetorical features: 1. Explanatory narrative. 2. Focusing on public concerns on privacy issues, and 3. Pleading tone.

In *Chapter 7*, I use PDA to analyse the China corpus and identify the following rhetorical features: 1. Top-down mode in government communications and neglect of public concerns. 2. Bureaucratic rhetoric and narrative ambiguities. 3. Commanding tone.

In *Chapter 8*, the CDA method is used to analyse the UK corpus. This chapter identifies the discourses first and then evaluates them with the Hobb's framework to investigate knowledge represented in them. It further discusses the following discursive features: 1. The Strategy of Renaming Digital Surveillance. 2. "It tracks the virus, not people", and 3. Technological descriptions.

In *Chapter 9,* the CDA method is used to analyse the China corpus. This chapter, again, identifies the discourses first and then evaluates them with Hobb's framework to investigate the knowledge represented in them. It further discusses the missing discourses: Vague concept of privacy information due to absence of legal protection, and emotional and psychosocial impacts. 3. Neglected individual rights and condescending tone in government communication.

Chapter 10 compares and discusses the findings of my analysis. In this chapter, I first recap the research purpose and questions. Findings and discussion are recapped then for answering the research questions. My evidence suggests that a blurred boundary between authoritarian and liberal democracy appeared in the use of surveillance during the public crisis. Democratic governments could adopt more authoritarian policies to manage the population in times of crisis. This could be a result of the nature of ruling power, as governments would prioritise the control of public crises, using technological solutionism to find effective approaches in pandemic control rather than ensuring democracy. After that, limitations and how this work is

expected to contribute are discussed. Finally, I provide potential suggestions for future research.

Chapter Conclusion

This chapter has introduced the rise of mass surveillance activities in pandemic control as a result of biosecuritisation during the global COVID-19 pandemic. Research motivation and backgrounds are elaborated to explain my purpose of conducting a comparative analysis to study how governments in China and the UK promoted surveillance technologies based on their political ideologies and cultural values. Existing knowledge on biosecuritisation and surveillance during the pandemic is reviewed. It identified a gap and aimed to contribute to academic research on the topics of political communications and surveillance culture studies. Additionally, it discusses the theoretical foundation, draws on Deleuze's control society theory, and provides an overview of the thesis structure.

Chapter 2 - Biosecuritisation, Big Data, and Digitalisation in State Surveillance

Chapter Overview

This chapter provides the background to the thesis by tracing a policy and power trajectory from biosecuritisation through to big-data surveillance on its way to the pandemic's tangible digital tools. It frames COVID-19 as a moment of inflexion in health governance, with the management of disease organised through security rationalities, data infrastructures and the management of compliance.

Section 2.1 defines biosecuritisation as the reconfiguration of health governance into security logics and situates it within a longer post-9/11 lineage of preparedness and technological response. It describes how digital contact tracing and QR-based systems are turning everyday life into data operations and how this is re-orienting political contestation around technical performance, legality and trust questions. This chapter links these transactions to their social impact, explaining the way in which classification by health status can categorise populations, create stigma, and lead to unequal exposure, with comparisons to China's HCS and the UK's NCA.

In Section 2.2, we can trace a state surveillance development from records keeping and citizen filing to the digital revolution. It positions surveillance at the same time as a monumental act of administration and as a contemporary technical one also punctuated by "chilling effects," institutional capacity and, last but not least, the promise of new technologies to stretch reach and reduce friction.

Section 2.3 establishes an account of post-9/11 anti-terror surveillance, China's extensive surveillance and biometric practices in general, its emergence in 2019, and counter-terror governance in Xinjiang. The chapter situates pandemic systems in a wider context of security-minded surveillance where global actors cross boundaries, as well as across policy arenas and institutional landscapes in the context of cross-security-directed surveillance, of pandemic systems.

Section 2.4 foregrounds privacy challenges and security practice by outlining civil-liberties critiques, concerns about consent and behavioural chilling, and counter-arguments that stress

crime-prevention benefits and evidentiary claims. This section outlines privacy as a repeated challenge to legitimise surveillance expansion, and presents multiple forms of its argument.

Section 2.5 describes big data in terms of increased data volumetricity and predictive analytics, platform-enabled data extraction and revolutionised surveillance and healthcare governance. It links big-data analytics to DPI, intelligence collection and healthcare digitalisation and connects this to Deleuzian control and wider datafication procedures.

Section 2.6 turns our attention to the pandemic and discusses the difference between China and the UK. It examines how China quickly adopted AI and biometric enhancement (including masked-face recognition) and the UK's heavier reliance on modelling and institutional analysis of information, then covers both its architecture evolution into what it is becoming and that of the NCA from being a single central design, which is decentralised to a decentralised one under pressures facing privacy and interoperability. The section ends with an indicator of post-pandemic paths ahead, warning of how emergency surveillance forces can keep building up stronger.

2.1 Biosecuritisation and Pandemic Governance

2.1.1 From Public Health to Security Logic

The concept of biosecuritisation is the reordering of health governance through security rationalities. In this process, infectious disease is framed as a threat to collective safety, and this type of framing expands the acceptable scope of intervention. As a result, under biosecuritisation, emergency language supports faster decision-making, wider data extraction, and intensified monitoring, while at the same time, ethical and political questions are often compressed into disputes over effectiveness, proportionality, and compliance (Wienroth et al., 2020). Moreover, this move draws on securitisation logics in which issues are elevated into security problems that justify exceptional measures and reconfigure public legitimacy (Buzan, Wæver and de Wilde, 1998; Floyd, 2016).

The post-9/11 literature makes clear that biosecuritisation is not new to COVID-19. Monahan and French (2011) describe an era in which healthcare delivery was framed by particular and interlocking technological imperatives around preparedness for a disaster, risk management, and an ongoing governance of the organisation that is centred on security, with technology being described as a response to emerging threats. This matters for pandemic governance as, with the solution from stabilised, surveillance infrastructures are common-sense measures of

resilience, and critique moves toward technical performance and managerial trust. The displacement effect in COVID-19 policy environments becomes particularly evident when we examine the ongoing debates surrounding pandemic surveillance. These discussions often focus on factors like uptake, accuracy, and measurable impact, while more profound issues of power and political accountability tend to be sidelined (Kirk, 2021; Wymant et al., 2021).

Digital contact tracing apps shaped by the pandemic conform to this model. In practice, they present public health as an administrable security field through identification, classification, and access control. Bodies and everyday practices are processed and recomposed as data flows, with the possibility of recirculating them into "data doubles" to inform the organisation's decision-making (Haggerty & Ericson, 2001). Under COVID-19 biosecuritisation, this data logic serves as a public health imperative, with infection risk treated as a security variable and the logic of data in a data-driven public health discourse. A noteworthy example of this is the NCA, which illustrates how claims of legitimacy were closely linked to its demonstrated effectiveness. This connection helped shape what was considered a "reasonable" public discourse about the app (Wymant et al., 2021).

The promotional discourse in the UK suggests a security logic that remains a product of a still liberal ideological world. The public uptake is justified as a civic obligation on the grounds of choice. In Matt Hancock's (PoliticsHome, 2020) case, for instance, citizens' own "duty" to download the NCA reduces voluntariness into a form of moral obligation, thus ensuring that refusal becomes socially injurious, even in the absence of formal coercion. In their analysis of UK messaging, they argue a similar issue: treating public health emergencies as security threats serves to normalise intrusive practices. As emergency measures gradually become normalised, we see these logics of crisis management transforming into routine expectations of responsible citizenship and effective governance (Wienroth et al., 2020). Recent legal scholarship on China's HCS governance highlights how the notion of "necessity" is often constructed through legal frameworks and administrative demands, which make it challenging to reject QR systems (Zhang, 2022).

The same turn to security manifests itself in China's case with a more robust infrastructural force. COVID-19 surveillance and QR systems research documents the intertwining of public health management and policing, platform governance, and mobility control, with citizenship framed as a condition of normal social access. Biosecuritisation here is driven by the rational claims of necessity and the practical effectiveness of gatekeeping infrastructures. This is why

evidence of "impact" and technical evaluations hold significant political weight; they contribute to the processes of legitimacy and normalisation. The security framework tends to favour solutions that can be audited, measured, and justified as effective (Wymant et al., 2021).

In fact, biosecuritisation in either regard generates a legitimising conversion in both cases. Health becomes an object of security; citizens become risk-bearing subjects; data becomes a governance substrate. The key point here is that "security" is not that something adds urgency. It rethinks the justification conditions, reduces opportunities for challenge, and makes surveillance look like responsible protection in crisis governance (Monahan and French, 2011; Haggerty and Ericson, 2000; Wienroth et al., 2020).

2.1.2 Infrastructures of Biosecuritisation

Biosecuritisation relies on infrastructures that make health as security a strategic operational reality. These infrastructures are socio-technical as well as institutional. They range from data flows and legal powers to platform standards and organisational routines on the way to threat anticipation, compliance checking, and rapid interventions at a population scale. As such, pandemic systems function within broader surveillant assemblages. In these assemblages, bodies are translated into usable data and then reassembled as administrative objects for sorting, alerting, and access decisions (Haggerty and Ericson, 2000). This helps explain why biosecuritisation occurs in everyday technologies and ordinary places. Health governance is embedded in technologies like smartphones, QR codes, and digital platforms that people already use for work, travel, and social interaction. Thus, security-oriented health measures are incorporated into the regular infrastructures of daily life, making surveillance practices appear practical, familiar, and difficult to avoid. Moreover, this shift redirects disputes into technical discussions. Interoperability emerges as a critical political issue, as it dictates which systems can communicate with one another. The thresholds established determine who may be flagged as a potential risk. Metrics of auditability and coverage serve as proxies for legitimacy, providing a language of proof that aligns with crisis governance (Lyon, 2018).

The platform–public health interface is a fundamental infrastructure layer in biosecuritisation. Exposure-notification systems exemplify how app governance is affected by mobile operating system and developer standards, as well as limitations on data flows, identifiers, and permitted uses (PHII, 2020). Public health authorities using these technologies must function in a technical system in which both Apple and Google define the arrangement of

proximity data that is collected, stored, and shared (PHII, 2020). These constraints strengthen claims of privacy-by-design but also infuse governance choices with code and platform policy, repositioning political questions into technical design concepts.

At the same time, these arrangements centralise infrastructural power among a select group of platform actors who efficiently dictate the conditions under which state and public health activity may take place. Platform governance scholars identify application programming interfaces and system rules as quasi-constitutional restraints that prescribe what public authorities are and must be allowed to construct and where surveillance is operationalised (Gorwa, 2019; Plantin et al., 2018). In the case of COVID-19, this meant that the governance of public health was partially outsourced to private technology firms, whose standards regulated risk handling, compliance scope, and the limits of legitimate use of data (PHII, 2020; Morley et al., 2020).

A second layer is a framework of legal and regulatory guidance. This layer decides what type of data to process and who has access to it, what constitutes an appropriate emergency rationale and what does not. In Europe, data protection authorities provided detailed guidance on contact-tracing tools and location data during COVID-19, setting the conditions of lawful processing and being justified by proportionality. These protections operate as enabling architecture to serve deployment and provide legitimacy narratives for such exceptional action (EDPB, 2020).

The third layer is public health ethics and governance frameworks. It also codifies principles such as necessity, time limitation, transparency, and accountability into technical requirements. Whilst the WHO guidance and an expanding ethics literature have taken these principles as the basis of public trust, they can also restrict political critique towards procedural compliance (WHO, 2020; Morley et al., 2020). As a result, "good governance" may be equated with merely passing design checklists, while more pressing concerns surrounding inequality, enforcement, and downstream exclusion often remain inadequately addressed within the infrastructure. Furthermore, evaluations of evidence-based apps can inadvertently reinforce this situation, as the notion of "proven effectiveness" becomes a rationale for maintaining infrastructures long after the immediate crisis has subsided (Wymant et al., 2021).

Finally, biosecuritisation depends on communicative and organisational routines that shift measures from emergency proposals into regular practice. This is a good account to give in work on surveillance culture and liquid surveillance. This theory helps to illustrate why such systems can also feel both practical and mundane, as the experience of monitoring is perceived as routinely processing data and background verification (Lyon, 2018). When emergency infrastructures remain in place after the crisis subsides, biosecuritisation takes on a lasting form, staying available for reuse under new risk narratives and policy objectives (Wienroth et al., 2020).

2.1.3 Discrimination, Social Segregation, and Bias

However, when biosecuritisation is managed to be stable using logics of security and infrastructure, as well as routines of infrastructure, the consequences for stability range far beyond crisis governance, resulting in social differentiation. Once health is coded as a security parameter and regulated via classificatory processes, populations are sorted and ranked. Access to mobility, work and public space becomes dependent on quantitative decisions that assess risk and compliance. This process parallels historical periods of transformation in which bodily features were instrumentalised to abstract into administratively legible markers of threat and deviance, and has been exemplified in racial science, physiognomy and eugenics, where biometric measurements were used to naturalise exclusion through the rhetoric of objectivity (Galton, 1885; Kevles, 1995).

From the perspective of surveillance studies, this continuity can be most parsimoniously conceptualised through Haggerty and Ericson's (2000) theorising of the surveillant assemblage, which has been explained previously. This logic is reproduced in a health register via pandemic biosecuritisation. Consequently, individuals become subjects of risky data, and their health status is the proxy for legitimacy and social value. As critical race surveillance scholarship has demonstrated, such classificatory systems are likely to intensify the inequalities that already exist because data infrastructures are not socially neutral and frequently inscribe pre-existing power asymmetries (Browne, 2015; Kaye, 2006).

Once they are embedded into everyday verification practices, these health-based categories can define moral judgment as well as a sense of social belonging, as in some bodies are seen as irresponsibly hazardous or disposable. Biosecuritisation is therefore extended beyond emergency governance to the machinery of social ordering, which has ramifications for dignity, equality and prejudice.

2.1.3.1 Dehumanisation and Social Segregation in the Use of the HCS

In the use of China's HCS, discrimination and social categorisation frequently happen, which share similarities with the discriminatory outcomes associated with biometric surveillance systems mentioned above. Just as biometric surveillance can lead to the labelling and targeting of specific groups, such as Muslim Uyghurs or other ethnic minorities in DNA databases, labelling individuals who tested positive for COVID-19 as *"Gong Yang"* ("公羊", male goat), *"Mu Yang"* ("母羊", female goat) or *"Xiao Yang Ren"* ("小阳人", literally "little positive person" in Mandarin Chinese) can be seen as a social categorisation that carries shaming connotations (Legal Daily, 2022). The word *"Yang"* ("羊", goat) shares the same pronunciation as "阳" (positive). Some people drew pictures of catching goats on their white hazmat suits for fun, which stirred media debates, arguing these behaviours dehumanised and discriminated against COVID-19 patients (Legal Daily, 2022). These labels may not carry the same racial or ethnic weight but represent a cultural tendency to categorise individuals based on specific health conditions. Yet, social segregation and bias can result, as well as similar results caused by eugenics, racial profiling and criminal databases.

2.1.3.2 Diluted Government Power in the NCA to Avoid Biases

The UK's NCA was designed to limit potential surveillance features under the shadow of several stakeholders, including the human rights group, the European GDPR and the appeal of the biometrics commissioner. Unlike China's HCS, which uses advanced biometric ID devices (e.g., "Digital Sentinel"), the NCA does not collect or process biometric data. Rather, it emphasizes the use of anonymised proximity information only (Hanvon, 2022). This change represents a new way of looking at surveillance that shifts from a more old top-down model towards collaborative, horizontal methods. Thus, government surveillance power is no longer too centrally vested in government and its surveillance is distributed and citizens have an incentive to participate in monitoring so it should take shape in a more distributed and less hierarchical system (Mann et al., 2003, pp. 338-339).

2.2 Evolution of State Surveillance

In the previous part, I introduced eugenics, racial profiling, and DNA criminal databases as early forms of biometric surveillance. Negative impacts, such as discrimination, social segregation, and biases caused by the use of these techniques, also appeared in contemporary surveillance practice especially in China. The UK government's approach to reducing top-

down surveillance characteristics and biometric data processing in the NCA attempted to avoid the potential for abuse or overreach that is often associated with top-down surveillance mechanisms.

This part provides an overview of the evolution of state surveillance in order to understand how surveillance forms are influenced by technological development.

2.2.1 Early Forms of State Surveillance

2.2.1.1 The Formation of the Information Society in the UK

Higgs (2014, p.23) theorised the "state" as a "single entity that collected information and acted on it in some logical manner". He further argues the concept of the "state" in subsequent research as a "place of contestation as a thing, where differing groups, professional interests, political parties and individuals struggled to forward their own agenda by associating themselves with the historical authority of the Crown, Law or Constitution" (Higgs, 2014, p. 23). The formation of an information society in Britain appeared before the Victorian era in the early eighteenth century. This marked a pivotal moment in the development of state power, where the ability to systematically gather and utilise information became central to governance. Centralised data collection allowed the state to exercise control more efficiently, influencing policy decisions and societal regulations. As the British state solidified its control through the development of record-keeping systems, it laid the groundwork for the modern information society. Giddens points out that the transition period from absolutist forms of government to the nation-state boosted the need for centralised information collection. He also found that in 1837, Britain established the modern civil registration system, which not merely recorded births, marriages, and mortality but also collected "moral statistics" that included suicide, delinquency, and divorce. etc. (Higgs, 2004).

2.2.1.2 The Household Registration System in China

China has a similar yet more restricted system for citizen information registration, which is known as the "household or residential registration system (Huji or Hukou)" (Wang, 2005, p.1). This system, before being adopted by the Chinese Communist Party (CCP) after the founding of the People's Republic of China (PRC) in 1949, had already existed in China for over 25 centuries (Wang, 2005, p.2). The prototype of the Huji system originated in the Xia Dynasty (21st-16th BC) for population census and household registration (Wang, 2005, p.33). In 375 BC, the Qin Kingdom fully adopted a system to manage families, collect activities

such as internal migration and expand the taxation basis for the empire's court (Wang, 2005, p.33).

2.2.1.3 Inevitable Information Gathering

Massive information gathering is an essential process that comes with any type of surveillance. Nevertheless, there is a significant difference between being spied on or overseen by the government or a corporation, though both could pose a threat to confidential data, privacy and social life. Government surveillance usually brings more direct impacts (whether negative or positive) on behaviours and social life, while corporate surveillance may not, especially the immediate effect that comes with acts and policies based on surveillance. Penney (2016, p.196) regards surveillance-related chilling effects as deterring people from "exercising their rights," including "the freedom to read, think, and communicate privately" that could be "corrosive to political discourse". Dorfman (2014) considers a state where surveillance is "ubiquitous and inescapable," "generates distrust and divisions among its citizens, curbs their readiness to speak freely to each other, and diminishes their willingness to even dare to think freely". Therefore, any form of citizen information collection by the government inevitably requires a massive data collection process that may trigger a fear of totalitarianism and panic of privacy invasion in the Occidental democratic society. It would probably cause the public to feel controlled and overseen by a "Big Brother" who keeps a close eye on citizens, as described in George Orwell's dystopian novel *1984*.

2.2.1.4 The Role of Technology in Surveillance Innovation

Lyon (2001, p.18) points out that telecommunication and computation in the 21st century have reduced time and distance in information exchange. These things developed in the late twentieth century have largely replaced clocks and timetables as tools of coordination and control (Lyon, 2001, p. 18). In the meantime, surveillance experienced great innovation and became more adapted to modern society by following the emergence of new technologies. Lyon (2001, p.18) explains that computer-based surveillance can track behaviours much more easily than inner activities like beliefs or premeditated actions. From the late twentieth century to the early 21st century, businesses have already started to trace and track consumer behaviours through transaction data generated by commercial activities in the markets (Lyon, 2001, p.18). The use of closed-circuit television (CCTV) cameras emerged earlier in the 1950s, and the first commercial system for retail stores surveillance appeared in the UK at the end of the 1960s (Klang, 2005, p.177). Television technology used by police expanded during

the 80s and 90s of the 20th century caused the police and security agencies hard to deal with a huge amount of visual information generated by these systems (Gates, 2011, p.62). Managing and monitoring tediously long videos costs considerable manpower. Therefore, entrepreneurs sensed a valuable business opportunity to promote the development of "Smart CCTV" based on facial recognition that is designed to automatically manage a huge amount of video materials without being observed by hundreds of human workers (Gates, 2011, p.62).

2.2.2 Digital-Powered Surveillance Technology

Surveillance in the digital era should be considered a powerful social control technology. Digitalised surveillance in the modern age becomes a "step change in power, intensity and scope" (Graham and Wood, 2003). Lyon (2014) points out that modern surveillance evolves from previous systems, and both past and present forms of surveillance are shaped by societal influences. Whenever in the past era or the 21st century, technology has been utilised as an efficient tool to control the "undesirable behaviour of others" by the ruling class (Klang, 2005). Surveillance, combined with technology, has many forms that are designed for different purposes. Governments in the modern world tend to continuously create a sort of Panopticon, as Bentham described, to minimise the human costs of surveillance (Foucault, 1977). In recent years, the trend of using surveillance technologies has become more sophisticated than ever. The rapid development of algorithms for big data analytics, the prevalence of biometric technology, especially facial recognition, and the Internet of Things (IoT) have further empowered existing means, including CCTV cameras, global positioning system (GPS) and online activity monitoring. These are largely adopted by governments, security agencies and businesses all over the world for gathering information on their target groups.

2.2.3 State Surveillance in China and the UK

2.2.3.1 Mass Surveillance in the UK

In comparison to other European countries, the UK seems to have a larger scale of surveillance. The total number of installed CCTV cameras across the country, according to incomplete statistics by different institutions, shows a rapid growth of urban surveillance in recent years (Temperton, 2015). Many journalistic opinions on the Internet believe the UK is one of the "most-surveilled" countries in the world (Temperton, 2015; BBC, 2006). By the year 2015, the British Security Industry Association (BSIA) estimates there are approximately 4-5.9 million CCTV cameras in the UK (BBC, 2015). A notable fact in the

data I noticed provided by Comparitech indicates London is one of the top eight cities with the most intensive CCTV cameras in the world, and it is the only Western city amongst the top eight cities, which are all in China (Bischoff, 2019). This statistic indicates London has installed more CCTV cameras than Beijing, which has 627,707 cameras for 9,176,530 people (68.40 cameras per 1,000 people) compared to 800,000 cameras for 12,967,862 people (39.93 cameras per 1,000 people) (Bischoff, 2019).

The Investigatory Powers Act (2016), which also known as the "Snooper's Charter," is the primary piece of legislation that regulates digital surveillance, and has been the subject of considerable debate over civil liberties, privacy and state overreach (Big Brother Watch, 2023). It sets out that the Government Communications Headquarters (GCHQ) and numerous other security agencies can intercept, collect and analyse extensive sets of personal information. Information sources may include phone lines, internet traces, e-mails and location information (Chen, 2016). This invasive surveillance of data has been rationalised as a matter of national security, for the state argues that its action is necessary to counter terrorism, criminal gangs, hostile state actors and other offences (including child sexual abuse), to "keep the British people safe" (Home Office & Tugendhat, 2024). One of the widely-held criticisms of the act is that it codified mass surveillance, enabling "intelligence agencies are able to gather information on a large group of people without individualised suspicion" (Liberty Human Rights, 2019). Liberty Human Rights (2019) criticises that the Act "created the most intrusive and sweeping state surveillance regime of any democracy," noting that it would be open to the government to watch not only the potential criminals, but perhaps just anyone using their phones and their electronic communication.

GCHQ has been at the forefront of implementing these powers. *The Guardian* and revelations from whistleblowers, including Edward Snowden, exposed GCHQ's involvement in mass data collection programmes, which indiscriminately harvest data from fibre-optic cables (MacAskill et al., 2013).

2.2.3.2 Sophisticated Surveillance Infrastructure in China

China has a more subtle and complex situation than the UK. Because this country has a set of well-developed mass surveillance infrastructure that other countries may not have, such as using big data analysis combined with Artificial Intelligence (AI) and the IoT, and the controversial Social Credit System (SCS), which first emerged in 2014 (Xiao, 2019). The country is constructing what it refers to as the largest camera surveillance network in the

world, with a network of 200 million to 600 million CCTV cameras (BBC, 2017; McMillan, 2024). These cameras are part of the Tianwang (Skynet) surveillance system, which aims to integrate real-time monitoring with AI-driven facial recognition to track individuals' movements and activities in public spaces (Ng, 2020).

The trend in China today shows intrusive data collection has prevailed in both business and governmental activities. The HCS was co-developed and launched by both the Chinese government and a private technology firm, Alipay. It is built on the company's own personal information database, which shares citizen information with Chinese law enforcement (Kim 2020 et al., 2020, p. 3; Mozur et al., 2020). In China, platforms like Alipay and WeChat are not merely used for social networking but also serve as daily financial and social transactions while simultaneously collecting vast amounts of personal data that can be utilised by the state for monitoring and control (Zhang, 2023). This aligns with Lyon's (2018) concern, which argues that citizens are often unaware that their everyday interactions with private companies are subject to state scrutiny.

In short, state surveillance has a variety of forms, from citizen registration systems to modern digital surveillance. Mass surveillance has employed more techniques, and technology is rapidly changing the practice of data collection and observation. Moreover, a significant trend shows state surveillance activities have an increasingly large demand on the volume of data. For this reason, big data and machine learning have become popular among government intelligence departments and law enforcement in recent years and can be helpful in efficiently processing citizen information.

2.3 Historical Practice of State Surveillance

Before turning to pandemic-era biosecuritisation, we must understand that COVID-19 surveillance occurs in a longer timeline of state surveillance. This section gives that background by following the normalisation of security-driven monitoring, in particular via biometric and digital surveillance, which became normalised well before the pandemic. It helps to demonstrate that many tools, rationales and legitimacy claims were used and deployed in the context of COVID-19, which do not appear in a vacuum, but were inherited from previous counter-terrorism, migration control, and public order regimes. These past practices conditioned institutional expectations of risk, population management and technological solutionism, and public tolerance toward intrusive monitoring was fostered. Through analysis of post-9/11 surveillance expansion, China's intensive security

infrastructure and global patterns of biometric governance, this section describes the ideological and cultural frameworks that led to the pandemic biosecuritisation. It thus serves as a vital reference for understanding how political ideologies, surveillance cultures and surveillance were repurposed, intensified and rearticulated during COVID-19 rather than being generated afresh.

2.3.1 Biometric Surveillance as a Tool for Anti-Terrorism after 9/11

One important factor that boosts the prevalence of state surveillance in the 21st century is the rise of terrorism, cross-border crime and illegal immigration. Such security issues after the 9/11 attacks caused great panic among the public and the government. Surveillance technology thus became essential for early detection of potential attacks but also invaded several aspects of daily life while providing certainty to those who feel vulnerable (Introna and David, 2004, p.177; Tai, 2005, p.90).

In 2005, biometric surveillance had already been implemented in Europe and North America. These include Iris scans at airports, intensive installation of facial recognition CCTV cameras, and the storage of genetic information to spot known terrorists (State Watch, 2005). Following the technological change over time, biometric information has begun to play a vital role in modern surveillance practice, especially in recent years with the wide application of AI and algorithmic analytics (State Watch, 2005). The measurements used by this sort of technology are based on physical characteristics of individuals, such as fingerprints, DNA, retinas, voice, face, gait, and even facial expressions (emotion recognition) (ACLU, Burt, 2020).

AI-empowered CCTV cameras can identify individuals' facial characteristics from a database of faces collected by a variety of institutions, including but not limited to when applying for a driving license, a passport, or a library card (Introna and David, 2004). Interestingly, the UK is the first European nation to employ this type of surveillance camera in large-scale engineering projects. In August 2019, London's King's Cross started to use AFRT for security reasons, and the CCTV cameras are claimed to have "sophisticated systems in place to protect the privacy of the general public" (Murgia, 2019). Meanwhile, in September 2019, Gatwick Airport and Heathrow Airport confirmed their plans to permanently use face-scanning technology that will allow passengers to travel without being checked by humans (Bernal, 2019).

2.3.2 Intensive Surveillance in China

China, as a "Big Brother-like" state with the Skynet system, has employed more new technologies to improve existing surveillance means (Xiao, 2019). According to media reports, Chinese researchers at Fudan University have developed an "ultra-powerful camera" that can "identify a single person among stadium crowds of tens of thousands of people" (The Independent, 2019). Moreover, many media sources on the Internet reported that China is developing the "third-generation ID card", which requires the collection of citizen DNA samples and iris scans, and security agencies may be able to track the location of the ID card, though it has never been publicly announced by the authorities (Hao, 2019).

2.3.3 Global Trend of Digital and Biometric Surveillance Since 2019

The global trend of using biometric technologies seems to be becoming increasingly common. For instance, a DNA database is introduced to immigration control, which means in the future, governments may no longer merely rely on collecting biometric information such as photos, fingerprints and handwriting signatures like the UK's Biometric Residence Permits (BRPs) (Gov.uk). In October 2019, Reuters reported that the Trump administration plans to gather DNA samples from detained immigrants by the US authorities to prevent and detect potential crimes (Trotta, 2019). The plan was eventually launched on the 6th of January 2020, and it is reported that all information will be held by a "massive criminal database" of the FBI (Galvez, 2020). In fact, DNA testing involved in immigration policy is not a new thing that has emerged today. Many countries, including the UK and the US, usually require a genetic test in the process of citizenship application to identify the kinship between applicants. However, what the US practices today has a potential risk of increasing "exclusionary anti-immigrant policies" (Gullapalli, 2020). According to CBS News (2020), the plan would "obtain DNA profiles from virtually all migrants in US custody, whether or not they have committed crimes." The American Civil Liberties Union (ACLU) criticises the plan as a problematic "massive intrusion into individual privacy" (Galvez, 2020).

In regard to massive DNA data collection by the government, the US might not be the only country doing so. China and the UAE seem to have taken a step ahead of the rest of the world. The UAE officials have announced they will create a genome database, which tests three million residents in Dubai, to "spot diseases before they strike", and the first phase of the project is claimed to be done by 2020 (Matthews, 2018). In contrast, the Chinese authorities have not publicly revealed their scheme of massive DNA collection, while much

evidence indicates they are developing a technology that can predict physical features from DNA samples collected among about one million Uyghur Muslims detained in re-education camps (Offord, 2019). It is distinctive to see the difference between the purpose of massive DNA collection by the UAE and China. The former is mainly for the reason of ensuring national health, while the latter is suspected of running a mass surveillance project on Muslim minorities.

Nonetheless, the fact of what the Chinese authorities are really doing remains uncertain because media coverage related to this case is entirely different from inside and outside the Great Firewall. Through brief observation inside the "wall," there is no direct evidence to show the Chinese government is gathering DNA samples from Muslim minorities. The ongoing large-scale medical welfare project in Xinjiang Province offers free check-ups to all local residents. In July 2021, China Youth Daily, an official press of China, announced that over 53 million people in Xinjiang have undergone free check-ups, including Han Chinese residents, who comprise the majority ethnicity of the country (China Youth Daily, 2021).

2.3.4 Digital and Biometric Surveillance in China's Counter-Terrorist Policy

By preserving Deng Xiaoping's foreign policy to maintain a low profile international figure, especially in regions of active international terrorist organisations, China is believed to be a country shunned from the radar of the international Jihadist movement (Potter, 2013, p.70). Yet, the penetration of extreme Islamic ideology and separatists brought a series of security issues in the Northwest part of the country, which is mainly populated by the Uyghurs, as known as one of the Muslim ethnic minorities in China (Zenn, 2019).

After experiencing the July 2009 Urumqi riots and the 2014 Kunming attack, in which over 230 victims died in total, the Chinese authorities implemented several enforcement measures to maintain the stability of the region. These include the first massive installation of smart CCTVs in Xinjiang Province and railway stations all over the country, which triggered broad criticism overseas. The New York Times reported that some Chinese police departments and technology companies are practising "minority identification" that can spot Uyghurs in cities that have installed specially designed surveillance cameras because these ethnic minorities have distinct facial features from the majority population in China (Mozur, 2019). China consequently faced heavy international condemnations because face recognition algorithms could be biased on race and falsely accuse innocent people of a crime (Hao, 2019). However, the most controversial problem in China's case is that the algorithm developed by police

agencies and technology companies deliberately targets a specific ethnicity rather than a mixed database.

This could be considered a racialist science, which is similar to Nazi Germany's racialist policies that used several facial measurements to identify non-Aryans and Jewish (Goossen, 2016, p.225-226). For example, the Kiel Anthropological Institute and the Kaiser Wilhelm Institute studied 1,271 Mennonite refugees fleeing from Siberia and other parts of the Soviet Union to demonstrate their typical German cranial features (Goossen, 2016, p.228). The methods racial scientists used to calculate the refugees' "Germanic blood purity" included measuring their hair colour, eye height, nose shape, and other anthropometric factors (Goossen, 2016, p.225). Nazi Germany's racial policy boosted a series of pseudo-genetic sciences, including the Mischling test, sterilising "hereditarily ill" and the before-mentioned facial measurement (Mendes-Flohr, 1980, p.642, Burleigh and Wippermann, 1991, p.137, Goossen, 2016, p.225). These can be taken as some early examples of employing biometrics as a tool of social control, especially using facial recognition for political purposes.

Ethnicity estimates based on modern computer science can analyse human facial images more effectively than using callipers in Nazi German genetic research. Both the contemporary and traditional approaches are designed to spot racial and ethnic morphometric differences (Lu and Jain, 2004, p.114; Rothstein, 2005). Nevertheless, the Uyghurs are only one of the Muslim ethnicities in China. The Hui in Northwest China is also a Muslim ethnicity, which occupies nearly half of China's Muslim population (Lipman, 1997, p.24). This ethnic minority includes a large number of Han-converted Muslims in pre-PRC China who do not have distinct facial features in comparison to the Uyghurs (Lipman, 1997, p.24). Because of this reason, such ethnicity identification technology developed for anti-Islamic extremists does not work on the rest of the Muslim population in China.

2.4 Privacy Challenges and Security Practice

What the rights organisations are most concerned about in an era of high-tech surveillance is the risk of privacy violation and the fear of authoritarianism. ACLU (2019) regards DNA contains the "most personal and private information", and the risk of misusing this sort of information is increasing since genetic sequencing has become faster and cheaper than previously. Big Brother Watch (2019), the British civil liberties and privacy campaigning organisation, has launched a legal challenge to urge an "immediate end" to the use of live facial recognition by the Metropolitan Police. The organisation expresses a severe concern

that the all-pervasive surveillance system of "Big Brother", which was described in *1984,* will come to real life. In the meantime, the British advocacy group Liberty, which was established in 1934, is also campaigning for a ban on facial recognition in the UK. For Liberty, personal freedom is the biggest concern. They believe being watched and scanned would cause behaviour changes that people may deliberately hide their feelings or choose not to express opinions in public (Liberty, 2019). Secondly, as explained in the campaign article, by scanning every individual in sight, facial recognition cameras snatch "deeply personal biometric data" without consent that results in a "gross violation" of privacy (Liberty, 2019).

In fact, there are several benefits of using biometric technology for ensuring public security as an extension of police powers (Fitzpatrick, 2002, p.371). European countries today are facing a series of security issues, such as terrorism, cross-border organised crime and illegal immigration, that require urgent solutions to prevent disasters from happening. Fitzpatrick (2001) considers that the reason why surveillance cameras became popular may be due to the need to maintain social order and advertise themselves since they are ideal products to "stabilise and regulate the territories that global capital is constantly searching for." DNA databanks can also help the police to track suspects efficiently. As Fitzpatrick (2002, p.371) points out, firstly, DNA profiles could be more helpful to fight crimes perpetrated by habitual criminals since their biometric information is on record already, hence it could avoid innocent people who abide by the law from suspicion. Moreover, Fitzpatrick (2002, p.371) believes a DNA profile is an "objective form of evidence" which "should no more be thrown away than other pieces of evidence."

For this reason, biometric technologies, overall, have their advantages in crime prevention which traditional means may not have. Their efficiency can be well exerted mainly in large populated cities. However, a fear here would be considered as the abuse of government power if there is an absence of trust and legitimacy involved with data protection.

2.5 Big Data Analysis in Healthcare and Surveillance Practice

The expansion of global data (also referred to as the information explosion) is growing faster than ever, and it doubles every two years (Vishnyakova et al., 2014). The term big data has a wide range of definitions. A defining characteristic is the disproportionate expansion of data volumes beyond ordinary scales, produced through a process of information inflation (Bansal et al., 2016, p. 1). These data contain electronic records and data passively generated by the use of electronic devices and the Internet (Bansal et al., 2016, p. 1). Its core characteristic can

be understood as the ability to analyse, combine, and interlink large-scale datasets (Lyon, 2014, p. 2). Big data is commonly described through three defining features: volume, velocity, and variety, which refer to the sheer scale of data, the growing speed at which it is generated and processed, and the wide range of formats and sources from which it is produced (Bansal, et al, 2016, p. 1). It may also be understood as situations in which the scale of data, the speed at which it is collected, or the complexity of its formats exceeds the capacity of conventional relational methods, thereby necessitating extensive horizontal scaling and advanced computational techniques to enable effective analysis (Richards and King, 2014, p. 393).

The preceding sections have outlined the role of big data in digital surveillance. Surveillance can be understood, following Lyon (2014, p. 2), as the organised and ongoing practice of attending to personal information in a targeted manner in order to enable purposes such as governance, influence, control, or the allocation of rights and access. Modern digital surveillance techniques are no longer focusing on a current object, such as watching over an area where crimes may frequently occur or monitoring how many people are infected in one location. Instead, it becomes smarter by taking advantage of big data analysis that can work effectively in crime prevention, health, and commercial enterprise (HRBDT, 2020). The integrated data collected by agencies is generally combined with identity information, travel history, personal networks, and Internet browsing patterns (HRBDT, 2020). For example, the Deep Packet Inspection (DPI) surveillance technologies are one of the surveillance techniques powered by big data that can be used in mass surveillance situations. DPI is able to monitor the traffic of Internet data, including the exact content. For instance, a Syrian activist was arrested because every single step he has taken on the Internet was held by the agents (Fuchs, 2013). Another typical example is the Government Communications Headquarters (GCHQ), which has collected big data to locate and identify potential terror threats (HRBDT, 2020). Big data-driven surveillance is thus going to be a new generation of security measures in the world of information inflation.

Meanwhile, the healthcare data digitalisation has brought a vast amount of data. Healthcare organisations are adding terabytes of patient records to data centres every year (Vishnyakova et al., 2014). The NHS in the UK has built the Innovative Uses of Data (IUoD) team to improve its information analysis and reporting (NHS, 2020). The Chinese government has started to support the development of healthcare digitalisation with big data analysis since 2016, aiming to build a centralised database that shares all the Chinese citizens' medical

information across the country (Gov.cn, 2020). In medical extensive data analysis for healthcare management, machine learning algorithms are employed to help analyse three types of major data sources: clinical medical data, pharmacological research and life science data, and personal health data (Zou et al, 2022). Portable devices such as smartphones and wearable devices also generate information that can be sent through the Internet to the data centre (Zou et al, 2022). Big data with machine learning algorithms is expected to control diseases in their early stages in order to reduce the cost of treatment (Zou et al, 2022). These systems are also designed for managing supplies and medications for pandemic flu outbreaks, monitoring exposure patterns for infectious diseases, and managing the location and condition of patients during mass casualty incidents or natural disasters (Fisher and Monahan, 2011, p. 1).

Datafication in the digital era has converted living individuals' identities and activities into masses, samples, and data that are stored in the data centre as a "bank" (Deleuze, 1992, p. 5). Human society is now experiencing a "Big Data Revolution" in which all kinds of activities and decisions, such as content preference, shopping, voting, crime prevention, and cybersecurity, are influenced by big data analytics (Richards and King, 2014, p. 393). From the perspective of surveillance studies, the trend today may show a shift from discipline to control (Lyon, 2014, p. 2, Deleuze, 1992, p. 5). The Internet and advanced communication technologies have significantly reduced the costs of data collection, whether the institutes or individuals are able to control something actively.

2.6 The Role of Digital Surveillance Played Amid the COVID-19 Pandemic

2.6.1 Technology as an Essential Part of China's Pandemic Control

In early 2020, the outbreak of COVID-19 from Wuhan, China, led to a global pandemic and an increase in the utilisation of touchless biometric identification. Many lifestyles have changed because of the high contagiousness of the COVID-19 virus, and biometric identification is required to be updated in order to adapt to the new situation. Graziani, CEO of IDEX Biometrics, indicates that the pandemic is accelerating the transformation to a cashless society, which brings biometrics "one step closer" to life (IDEX, 2020). Biometric systems are rapidly introduced to industries including surveillance, border control, law enforcement and healthcare, and China has led this worldwide trend (Carlaw, 2020).

AI and machine learning (ML) play an essential role in analysing the evolution, geographic footprint, protein structure, and future development of the virus; meanwhile, they also help to

tackle identification problems in facial recognition (Carlaw, 2020). One of the significant changes is how digital surveillance systems with biometrics have improved. For example, nearly everyone in China wears a surgical mask outdoors, which becomes an obstacle for facial recognition systems, so corporations are urged to develop a more sophisticated algorithm to identify masked people in public areas (Pollard, 2020; Carlaw, 2020). In February, Hanwang Technology, the Chinese government-sponsored intelligent interaction company, rolled out a new algorithm that matches facial information behind masks (Pollard, 2020).

According to the company's claim, the misrecognition rate of the newest algorithm is claimed to be about 5% when wearing a mask, in comparison to a 0.5 % misrecognition rate when identifying unmasked people (Pollard, 2020). Infrared fever detection devices have not only become a common way for law enforcement, healthcare and transportation for biometric screening, but they can also be installed in CCTV cameras to help security check and border control (Carlaw, 2020).

2.6.2 Technology Used in the UK's Response to COVID-19

In the UK, London Heathrow Airport has started a trial of using thermal imaging technology to scan the body temperature of moving individuals, further enhancing the country's existing facial recognition (Planet Biometrics, 2020). Big Brother Watch has expressed its worry about thermal screening cameras in airports. According to the privacy campaign group, thermal screening, especially Heathrow's facial recognition thermal screening, may not detect fevers accurately and could breach data protection laws (Big Brother Watch, 2020). Carlo, director of Big Brother Watch, considers that thermal cameras are "more likely to benefit the surveillance industry than to provide any benefit to public health" (Big Brother Watch, 2020).

Nevertheless, in comparison to China's aggressive implementation of biometric surveillance, the most used approach for pandemic control in the UK generally relies on big data analysis. The "outbreak narrative" generated by the algorithm can create a series of images, phrases, scenarios, and storylines that can help the public and scientists understand epidemic disease (Abergel and Magnusson, 2014, p. 7; Wald and Weed, 2020). The Joint Biosecurity Centre (JBC), established in May 2020, is an integral part of the NHS Test and Trace service within the Department of Health and Social Care (DHSC) in the UK (Gov.uk, 2020). It offers analysis and insights based on a range of health and non-health sources of the UK's existing public health infrastructure and disease surveillance network (Gov.uk, 2020). The centre's

responsibility is to monitor and intercept the transmission chains of infection by bringing together data science, assessment and public health expertise that provides analysis and insight into the status of the epidemic across the country and build a picture of the pandemic infection rates in order to inform the users of the NHS contact-tracing app (Gov.UK, 2020).

2.6.3 The NHS COVID-19 app

The NCA does not require a mandatory installation, unlike China's HCS, which targets "a large scale of people in an omnipresent and compulsory manner" (Kim et al., 2020, p. 3). Initially, the contact tracing application followed a centralised model during its design phase. In this mode, data collected from users' devices is sent to a central server managed by the government and health authority, and the server determines who should be notified about potential exposure to COVID-19 based on proximity and duration of contact with infected individuals (Levy, 2020, p. 4). However, due to privacy concerns and interoperability issues, the NHS later switched to a decentralised model using the exposure notification framework developed by Apple and Google, which is designed to be more privacy-preserving (ORG, 2020; Gov.uk, 2020).

The app managed to minimise surveillance characteristics. Unlike traditional surveillance software, such as China's HCS, its primary data collection focuses on the users' contact information rather than conventional behaviour monitoring. It does not record users' precise locations or other detailed personal information. The decentralised data processing method and strict compliance with data protection laws also differ from the centralised data collection and processing methods of many traditional surveillance software. Therefore, the NCA can be seen as a surveillance tool specifically for public health protection rather than a comprehensive surveillance software in the traditional sense.

2.6.4 China's Future Plan on Biometric Surveillance After the COVID-19 Crisis

The worldwide pandemic has brought a direct impact on biometric identification systems, as the demand for contactless identification is increasing while fingerprint and vein recognition are facing a loss in the market due to a lack of infection control and a hygienic risk (Carlaw, 2020; Song, 2020). It could raise concerns about the near future of digital surveillance as well because more developed contactless identification technologies are inevitably demanded in such a situation, which would accelerate the evolution of biometric surveillance (Carlaw, 2020). China's case of rolling out the new algorithm, which identifies faces behind concealment, could be a starting point for a stricter society of control in this country. Other

types of biometric identification algorithms, like gait recognition, might run large-scale trials across the country in the near future that can no longer be tested merely on the streets of big cities such as Beijing and Shanghai (Dai, 2019). On the other hand, the rapid development of AI supported by the government could further push the formation of a very restricted surveillance society. According to Kai-fu Lee, Chinese entrepreneurs believe firmly in the value of AI, and they are making an effort to use AI as a great power for solving real-world problems, just as entrepreneurs in the 19th century exerted the potentiality of electricity on practical things such as cooking, lighting and powering of the machine (Dai, 2019). The implementation of Hanwang's behind-mask facial recognition, as a product of AI, could be extended to a country-wide update in post-COVID-19 China that would cause a much worse threat to citizens' privacy issues.

Chapter Conclusion

A brief overview of this chapter provides the historical and conceptual framework for the analysis of COVID-19 surveillance as a culturally and ideologically mediated form of governance. It shows that pandemic tools do not emerge in isolation. They depend on long security lineages, institutional predispositions to risk management, and multiplying digital infrastructures that make population surveillance practical, habitual, and politically defensible.

The chapter clarifies the three foundational claims which form the thesis. First, biosecuritisation reinterprets health governance from security rationalities first. This approach makes rapid intervention and wider applications of data palatable but also shifts political division to more narrowly focused questions of effectiveness, proportionality and compliance. Second, COVID-19 surveillance is made possible by the infrastructures, such as data systems, platform standards, legal regimes, and organisational routines that ensure health-as-security as part of the quotidian. These infrastructures make governance increasingly contingent on metrics, thresholds and technical architectures that shift public debates from power to performance. Third, the biosecuritisation has distributive ramifications. Once health categories serve as operational filters of mobility and access, they can perpetuate and reproduce social hierarchy through sorting, stigma and unequal burdens, in ways that echo histories of biometric classification and focused surveillance.

This chapter also serves as an introduction for the discussion of the discussion through its shift from conceptual (biosecuritisation), through historical and developmental evolution

(post-9/11 and trends in global surveillance), to technical capability (big data), and finally to pandemic situation reporting (China and the UK). It is also equipped to consider how political ideologies and surveillance cultures generate public rationales, moral vocabularies, and legitimacy assertions that informed digital contact tracing and pandemic surveillance devices.

Chapter 3 - Theoretical Framework

Chapter Overview

In this chapter, I explain the theoretical framework on which the thesis rests in order to clarify those concepts related to the investigation of political and institutional discourses in promoting biosecuritised surveillance techniques. The chapter proceeds through the following steps.

Section 3.1 defines the exact concept of *culture*, and the role of culture in the context of political engagement and surveillance. It explains the mechanism of cultural formation and transmission.

Section 3.2 takes a further look at culture. It looks at individualism and collectivism in order to understand why these values can affect the worldview of national citizens. This part evaluates the priority of personal or group rights in pandemic control, which is determined by the mainstream national culture of individualism or collectivism.

Section 3.3 introduces Foucauldian concepts on surveillance, including his theory of governmentality and biopolitics, which predicted today's situation of social control powered by digital means. In this section, I also take a look at Foucault's classic concept of discipline and punishment to examine how modern societies use technologies for social control and turn punishment from direct corporal punishment to self-discipline.

Section 3.4 explains Deleuze's *control society,* which compares the situation of datafication with his idea of foreseeing how living individuals have been translated from bodies to manageable data.

Section 3.5 explores the role of surveillance culture in a digital age, its relationship with political culture, and its persuasive role in promoting such products.

Section 3.6 explains the concept of ideology at first. Then, it discusses how news values and ideology shapes the process of agenda-setting, especially in the context of promoting digital contact tracers during the pandemic.

3.1 Understanding Culture

3.1.1 Defining Culture

Because of its cultural-political orientation, this thesis requires a clear theoretical definition of culture. The study of how cultural meaning, collective norms and practices structure public communication and political legitimacy draws on cultural theory (see Chapter 5). It has also been a multivalent concept within cultural and social theory. Arnold (1867) defined *culture* to include intellectual and artistic pursuits which were rooted in characteristic and esteemed forms of refinement or practice within a given society. Tylor (1869) expanded the definition to a learned "complex whole" consisting of knowledge, belief, morals, law, and custom developed through membership in society. Kroeber and Kluckhohn also emphasised culture itself as durable categories, premises, and moral systems that structure lives collectively and to be traced in religious and philosophical traditions (Oatey, 2012, p. ix). Matsumoto has a narrower definition, as common attitudes, beliefs and behaviours are intergenerationally transmitted, yet heterogeneously manifested at the individual level (Oatey, 2012). Given that culture forms the social fabric of culture, Kashima's (2016) formulation is particularly useful for discourse analysis since culture is regarded as socially transmissible information shaping cognition, affect and behaviour at the population level.

This thesis also invokes Williams' (1977) view of "structures of feeling," which understands culture as lived and emergent. It focuses attention on how people think and feel at particular moments in history, not only what is explicitly said by law or doctrine, but also how these are unstable or contradictory (Williams, 1977). Finally, Marxist cultural research emphasises materiality as a source of forms and meanings in culture and acknowledges that culture can return as a corrective to social arrangements. According to Williams, material conditions include the social resources and structures associated with production, reproduction, and communication, which form cultural "superstructures" including traditions, law, and art (Williams, 1977, p. 5). Thompson (1963) has similarly highlighted reciprocal influences through collective "moral economies," whereby norms and values emerge from the material, and help produce behaviour and class relations.

Finally, culture here is conceptualised as a historically construed and socially circulated configuration of meanings, norms, and affective practices. It orders perceptions of authority, risk, responsibility and legitimacy, and may help us understand why comparable governance

projects may be rationalised and treated differently across nation-states (Arnold, 1867; Tylor, 1869; Oatey, 2012; Kashima, 2016; Williams, 1977; Thompson, 1963).

3.1.2 National Culture

In cultural studies, social groups are divided into multiple subgroups in human relationships, from family and neighbourhood as minimum units to ethnic affiliation and nation as large units (Karmsch and Widdowson, p. 6, 1998). To fit the context of this thesis, I focus on the concept of culture on a national scale to discover how culture may influence the practice of mass surveillance techniques and the way of persuading the public to accept them. Hence, here, it is necessary to take a look at British and Chinese culture.

3.1.2.1 British Culture and Mass Surveillance

Britain is a reflection of a specific cultural-political context influenced by its imperial history and its move towards a multicultural liberal democracy, and one that has had a deep influence on the management of authority, security and legitimacy (Cannadine, 2002; Hall, 2002). Such a background is vital to interpret the findings for the UK because current biosecuritisation references long-standing administrative logics of surveillance that arose under imperial rule. Colonial apparatuses (such as the pass system, which controlled mobility through documentation and verification (Marks, 1986; SAHO, 2011), and cartography, which made territories governable as a form of bureaucratic authority using technical knowledge (Stone, 1988), show how surveillance historically served as a mechanical rule instrument incorporated with legalistic and logistic rhetoric.

Liberal states, as Harcourt (2007) argues, have also regularly justified surveillance by way of procedural and legal norms. The UK corpus fairly evidences this persistence. Digital contact tracing is portrayed as a technical response to risk, supported by audits, oversight, and privacy protections. This liberal framing demands critical attention. By transforming surveillance into administrative care and responsibility of the individual, political debates over power are replaced by an exercise in discourse which concerns design and trust (Lyon, 2007). This leads us to conclude that the UK's emphasis on voluntariness and privacy does not decrease surveillance, but re-legitimises it in culturally acceptable terms, which provides conditions for the recovery of historically rooted monitoring practices, enabling historically rooted monitoring practices to be reactivated and normalised within contemporary biosecuritisation.

3.1.2.2 Chinese Culture and Mass Surveillance

Chinese governance traditions are closely tied to long historical formations of centralised administration, yet the relationship of "culture" and modern surveillance should be treated cautiously. A long feudal past by itself does not mechanically generate current surveillance practices. It provides a toolkit of legitimation and authority that can be selectively invoked. Feudal rule in China is typically traced from the time of the early dynastic periods through to the fall of the Qing in 1912 (AFE, 1995). Throughout the years, this history has normalised a strong centre, a layered bureaucracy and a moral speech of order. These features are key for surveillance because they shape what constitutes rational governance in times of crisis, including the expectation that state mandates can be broad and responsive to change with ease and speed.

The Confucian political philosophy is widely turned to for its account of hierarchical social relations and duty-bound citizenship. However, its function in epidemic surveillance ought not to be sentimentalised as consensual concord. Confucianism also embodies an ethic of relational responsibility and role-based hierarchies that can undergird paternalistic state discourses of intervention as "care," compliance as virtue (Bell, 2008). Nevertheless, Confucian language also relies on moral performance of rulers. In practice, Confucian themes are deployed in state discourse to characterise dissent as disorder or selfishness, where political disagreement becomes a moral failure. This is important in the context of mass surveillance by blurring the discourse space for rights-declarations and by minimising privacy concerns as inferior to obligations to the collective. "Culture" here serves as a rationale vocabulary that helps to make intrusive surveillance socially intelligible.

Legalist statecraft offers a different, more overtly coercive strand. Legalist philosophers focused on Han Fei and the Qin state maintained that order depended on clear rules, strict application, and the concentration of state power (Zalta et al., 2023). The centralisation of the Qin Dynasty is often cited as an early example of bureaucratic rule through law and practice (Zalta et al., 2023). Legalism, according to Pines (2014), is ultimately more a system of administration, rather than a philosophy which would be synthesised with other traditions in later dynasties. For this thesis, the point is not that "Legalism brought about" modern surveillance, but Legalist-style approaches can still provide the legitimation for strong state intervention by means of necessity, uniformity and enforcement. In biosecuritisation settings, this logic lends credence to the idea that compliance can be legally enforced and a governance legitimacy can be illustrated by effectiveness.

These traditions should be viewed as cultural-political resources that can be mobilised in the processes the modern state uses. Modern digital surveillance is subject to broader institutional capacity, platform infrastructures, crisis politics and global security rationalities. How these drivers and legacies are narrated and accepted is determined by historical legacies. The point in this case, related to the HCS, is that the legal requirements and negative punishments for non-compliance are communicated as the practical requirements of order and safety, not as exceptional violations. This is, however, not to say that there is widespread cultural acceptance in any straightforward way. It suggests a discursive context in which hierarchy, necessity, and administrative power are readily available as the public justification and the latter are not strong limiting principles in formal communication.

3.1.3 Political Culture

To the extent of surveillance culture in different national contexts, the practice of state surveillance can reflect a nation's political and social ideologies. These ideologies are products of political culture fostered in each specific national context. *Political culture* is a component of national culture. This concept was first termed by Gabriel Almond in 1956 to address the classical problem of specifying how people affect their political system and vice-versa (Chilton, 1987, p.1). His initial definition of political culture is "the particular pattern of orientations to political action" (Chilton, 1987. p. 1). Almond and Verba (1965. p. 33) indicate that "the relationship between political culture and political structure [is] one of the most significant researchable aspects of the problem of political stability and change". Political culture is "a set of shared views and normative judgements held by a population regarding its political system", and it does not refer to attitudes toward specific actors such as a president or prime minister but rather denotes how people view the political system as a whole and their belief in its legitimacy (Winkler, 2020). According to Pye (1991, p. 17), it is composed of basic values, feelings, and knowledge that make up the political process. Winkler (2020) concludes that the components of political culture are "the beliefs, opinions, and emotions of citizens toward their form of government".

3.1.3.1 Cultural Factors in Promoting Mass Surveillance Tools

When it comes to political activities such as promoting mass surveillance tools, governments and institutions in liberal democratic societies also need to take their national cultural contexts into account. The main aspects which have to be concerned are their citizen's privacy awareness, the leaning of individualism/collectivism, and linguistic culture in

discursive practice. Political culture and the ideological mindsets shaped by it are as complex as all types of cultural activities, which keep changing over time. Almonds (1983, p. 127) points out that the success or failure of communist regimes can pose a significant ideological impact on the attitudes and behaviours of the population. The interactive relation between political structure and culture is inextricable, and the attitudinal patterns tend to continue in a particular form and degree for a period of time. For example, citizens of a country which the communist movement has influenced would think it is normal to be under the surveillance of party activists (Almonds, 1983, p. 127). Political culture cannot be easily transformed unless it is being "manipulated, penetrated, organised, indoctrinated, and coerced" through a sophisticated political movement and being continued for a generation or longer time span. For this reason, the agenda in promoting surveillance tools is differentiated by cultural-ideological concerns.

3.2 Individualistic and Collectivistic Culture

3.2.1 Social Responsibility of Individualist and Collectivist Cultures in Pandemic Control

In this thesis, individualism and collectivism are useful as cultural-political frameworks that inform what responsibility, duty, and compliance constitute in official communication. While some studies have linked national individualism-collectivism patterns to different pandemic outcomes (Maaravi et al., 2021; Spiro, 2021), such correlations are out of the scope of a discourse-led research and can be confounded by demographics, health-system capacity, policy timing, reporting regimes, and institutional trust. As such, the key issue here is not whether either individualism or collectivism predicts infection rates, but how these orientations are mobilised as justificatory languages for mass participation in biosecuritisation measures when governments seek to implement these things.

In individualist political cultures, pandemic communicative behaviour is based particularly on responsibilisation. Appeals stress personal choice, while placing moral requirements on that choice, so that conformity is presented as an instance of ethical conduct committed by autonomous citizens. This is apparent when UK officials promote uptake under terms of protection for "loved ones" and "the wider community" (The Telegraph, 2020), framing participation as voluntary yet socially consequential. A similar rhetorical tactic is observed within the US example (Maaravi, 2021), where "It's not about me, it's about we" messaging transitions from personal liberty to joint duty. Such language is cultural work. It

recontextualises collectivistic moral claims within an individualist paradigm by framing public health in the terms of civic obligation and responsible self-management. The result is a reduction in space for refusal without completely redefining the system as coercive.

In more collectivistic political contexts, official communications can serve as a way to default to coordinated compliance and normalise sacrifice as part of crisis governance. Chinese propaganda has even been characterised as employing collectivistic moral vocabularies that necessitate individual sacrifice for a common end (Hung, 2020). Pandemic response was framed through "people's war" narratives that combined unity, mobilisation, and discipline (Xinhua News, 2020) by state media. In this discourse context, the citizen is not treated as a disinterested chooser. Nor are they someone who simply needs to be persuaded or instructed. Instead, the citizen is positioned as an engaged participant within organised public bodies who can be mobilised and activated. Compliance becomes an identification of loyalty and moral value, and critique is coded as disorder or selfishness.

However, despite the HCS being officially claimed to be used voluntarily, there were a series of legal requirements that turned the compliance mandatory (China News, 2020; CPPCC, 2022). According to CCTV News, Beijing's disease-control investigators discovered that a roast-duck restaurant failed to enforce the localised HCS ("Jiankangbao") QR-code scanning and temperature checks. From 10 to 15 March, 477 of 830 customers did not scan, which authorities said obstructed contact tracing, quarantine transfer, and population management. Police later launched a criminal investigation into the owners for suspected "obstructing the prevention and treatment of infectious diseases," following an infection chain linked to the venue, with broader secondary control measures implemented. Three lawyers interviewed framed QR "scan registration" as a legal duty during emergency epidemic control. They also observed that liability may vary from administrative penalties to criminal and civil responsibility, depending on harm and intent (CCTV, 2020).

This case shows how collectivistic discourse is stabilised through legal codification. What is framed rhetorically as moral duty and collective sacrifice is backed by enforceable obligations and punitive consequences. Voluntariness functions at the level of language, while compliance is secured through criminal, administrative, and civil liability. Biosecuritisation thus operates through a convergence of moral appeal and juridical force, narrowing the space for refusal and transforming participation into a condition of lawful social membership.

However, we should also consider this distinction critically. Individualism and collectivism are not fixed national dispositions, and neither engenders one kind of governance. They are flexible discursive resources which can be accentuated, attenuated and integrated at times in response to the governing problem. They are important in this thesis because digital contact tracing requires mass coordination, but they can also raise issues of autonomy, privacy and legitimacy. Britain and China both espouse a collective responsibility, yet in practice, they do so by different rhetorical mechanisms. Discourse with individualist leanings tends to rule through consent talk and moralised choice, whereas collectivist-leaning discourse is more likely to normalise directive mobilisation and sacrifice. These differences are key to how biosecuritisation is spoken about, justified and stabilised in every nation.

3.2.2 Values of Individualism and Collectivism in Modern Society

This project only focuses on the cases in China and the UK since they are two representative countries of individualistic culture and collectivistic culture. This type of cultural difference can be considered as a main ideological reason which differs in the way of persuasion in each social context. Therefore, it is crucial to identify the values of individualism and collectivism from a theoretical perspective. Contrasting individual and collective focus is a long tradition in the Western world, and individualism is usually regarded as the opposite of collectivism when comparing Anglosphere and East Asian cultural frames (Oyserman, et al, 2002, p. 3).

The idea of contrasting national culture on the basis of country-level individualism/collectivism has been continued in the past 30 years by following Hofstede's conceptualisation (Oyserman, et al, 2002, p. 3). Hofstede's concept includes two poles of cultural dimensions to measure the index of collectivism and individualism in certain countries (Brewer and Venaik, 2011, p. 3). By his definition, individualism "stands for a society in which the ties between individuals are loose" and that "everyone is expected to look after her/his immediate family only" (Hofstede, 2001, p. 225). In contrast, collectivism indicates a society consists of cohesive in-groups, which are made up of people who are dedicated to serving the group throughout their lifetime in exchange for "unquestioning loyalty" (Hofstede, 2001, p. 225).

Oyserman et al. (2002, p. 9) 's IND-COL scales assessed the psychological attitudes of persons in each national culture by seven IND and eight COL components (see table below). These components and descriptions have conclusively summarised the mainstream mindset of social members in each national context. They can be helpful for evaluating how

ideological strategies in promoting biosecuritised means are differentiated in accordance with national contexts.

Table 1

Individualism and Collectivism Domains Assessed in Individualism–Collectivism Scales

Domain name	Description	Sample item
Individualism		
Independent	Freedom, self-sufficiency, and control over one's life	I tend to do my own thing, and others in my family do the same.
Goals	Striving for one's own goals, desires, and achievements	I take great pride in accomplishing what no one else can accomplish.
Compete	Personal competition and winning	It is important to me that I perform better than others on a task.
Unique	Focus on one's unique, idiosyncratic qualities	I am unique—different from others in many respects.
Private	Thoughts and actions private from others	I like my privacy.
Self-know	Knowing oneself; having a strong identity	I know my weaknesses and strengths.
Direct communicate	Clearly articulating one's wants and needs	I always state my opinions very clearly.
Collectivism		
Related	Considering close others an integral part of the self	To understand who I am, you must see me with members of my group.
Belong	Wanting to belong to and enjoy being part of groups	To me, pleasure is spending time with others.
Duty	The duties and sacrifices being a group member entails	I would help, within my means, if a relative were in financial difficulty.
Harmony	Concern for group harmony and that groups get along	I make an effort to avoid disagreements with my group members.
Advice	Turning to close others for decision help	Before making a decision, I always consult with others.
Context	Self changes according to context or situation	How I behave depends on who I am with, where I am, or both.
Hierarchy	Focus on hierarchy and status issues	I have respect for the authority figures with whom I interact.
Group	A preference for group work	I would rather do a group paper or lab than do one alone.

(Oyserman et al., 2002, p. 9)

The worldview and self-identity of citizens can be primarily influenced by the country's cultural leaning toward individualism or collectivism. It focuses on more personal autonomy and self-fulfilment than group achievement (Hofstede, 1980). Schwartz explains the concept of *individualistic society* as "fundamentally contractual, consisting of narrow primary groups and negotiated social relations, with specific obligations and expectations focusing on achieving status" (Oyserman et al, 2002, p. 4).

Therfore, the key values of individualism are autonomy and that consequences of action affect the individual, while the values of collectivism focus on collective responsibility which indicates consequences of action affect the whole group. The core idea of collectivism assumes a group-bound and mutually obligated social relationship in which group interests are prioritised all the time (Oyserman et al., 2002, p. 5; Schwartz, 1990). Collectivistic culture advocates the superiority of the group or community, putting group interests ahead of

those of individuals, and individual freedom is restricted by the group. Members of a collectivistic culture take group membership as a central aspect of identity and are willing to sacrifice personal good in exchange for the common one and avoid conflicts to close others (Oyserman et al, 2002, p. 5). In short, individualism is a worldview in which personal interests, including personal achievements, personal identity, and personal control, are centralised, while social ones are peripheralized. Social members in such a cultural environment would express their personal needs and feelings in a more direct way, yet members in collectivistic societies are likely to restrain their emotional expression to ensure in-group harmony (Oyserman et al, 2002).

3.2.2.1 The Tendency Towards Collectivism and Hierarchical Power in COVID-19

Collectivistic culture, however, is not merely the opposition of individualistic values. It also inherits feudalistic power relations, which keep direct hierarchical power over group members, and those who are under a lower hierarchical order have less liberty to challenge the higher ones (Chung, 2020). During the pandemic, centralised decision-making was a common response to manage the crisis efficiently. Governments and organisations often rely on a top-down mode to enforce public health measures and allocate resources (Greer, et al., 2020). The Chinese government's response to the COVID-19 outbreak was characterised by highly centralised decision-making and strict enforcement of public health measures, including rapid mobilisation of resources such as healthcare workers and medical supplies, mass testing and contact tracing supported by digital surveillance (Wang et al., 2020; Chen et al., 2020). In the UK, centralised decision-making in response to the pandemic was also adopted. The UK government implemented nationwide lockdowns and social distancing measures, and these decisions were made centrally and communicated to the public through official channels (Lynn et al., 2021). The sampled official announcements also indicate a tendency towards collectivistic communication when the UK government urged citizens to participate in the test and trace programme (see Chapter 8).

Section Summary

In brief, culture is the term used to define the complexity of shared attitudes, beliefs and behaviours among social groups. The term political culture refers to collective ideas of political systems. Language and cultural attitudes also play a role in perceptions of surveillance and biosecurity tools. A brief comparison is provided to highlight individualistic and collectivistic cultures and their impact upon pandemic responses. Collectivism has been

associated with hierarchical power structures. This was illustrated in China's centrally directed management of the pandemic, including harsh lockdown regulations and mass mobilisation. The UK also offered a centralised decision-making response which has collectivist features in lockdown management and health advice. Now, following the introduction of the way in which culture affects political communication, we shall consider the character of power in surveillance by the state.

3.3 Foucault's Governmentality

3.3.1 Governmentality and Biopolitics

In this section, I discuss biopolitics after explaining the concept of governmentality as this concept matches the real practice of biopower during the COVID-19 period, especially in the context of deploying the HCS to categorise citizens by their health status, social activities and travel history.

Government, according to Foucault's (1991, p. 100) understanding, is purposed to secure "the welfare of the population, the improvement of its condition, the increase of its wealth, longevity, health, etc." rather than controlling designated groups through detailed supervision in confined quarters, such as prisons or asylums. His notion of *governmentality* offers an insight into the ways in which contemporary authorities have sought to shape and regulate society and to do so in a way not possible through the mediation of state theory (Kerr, 1999, p. 173). It is different from *governance in* that it does not focus on instruments and modes, procedures and actors, and forms of cooperation. Governmentality is an expansion of the definition of governance, which specifically concerns the activities or practices of government that examine how political actors use calculated means to positively make people consent and willing to participate in their agenda (Huff, 2020). In comparison with *governance,* it seeks to set conditions, arranging things so that people, following only their own self-interest, will do as they ought (Scott, 1995, p. 202).

Foucault's governmentality requires the exercise of a distinct, governmental rationality (Li, 2007, p. 276). It emphasises a way of considering government as the "right manner of disposing things" in pursuit of a "whole series of specific finalities" to be accomplished through "multiform tactics" instead of one dogmatic goal (Foucault, 1991, p. 95). Dean (1999, p. 33) explains the "finalities" and "right manner" of achieving them points to the utopian element in government, which seeks better ways of doing things and better ways of living. It is much more focused on techniques and attaching itself to technologies for bringing

improvement to the state. In modern democratic systems, tactics of making the public satisfied with new policies or actions are more important than ever. Justification of certain actions that may not be acceptable in normal situations hence has become a common means. Many cases of promoting COVID contact-tracing apps can reflect the characteristics of Foucauldian governmentality. For example, western governments, including the UK, would convey the idea of protecting others or make the pandemic a security threat while emphasising it is voluntary to urge people to download the apps and share their private data spontaneously (Wienroth et al, 2020). In contrast, authoritarian systems, say, the CCP China, require citizens to use the app as an obligation in a relatively "straight" way of communication that has less concern about the citizen's consent (Holmes, 2020).

Both the governments of China and the UK used pandemic control measures that reflect Foucault's concept of governmentality, but they did so within their distinct political and cultural context. To be specific, the UK government respected the importance of individual consent and voluntary participation, which represents Foucault's concept of governmentality by seeking to create conditions for acceptance based on the public's self-interest and moral obligation to society. China's policies focused on the effectiveness of centralised control and collective responsibility. This mode, however, is more likely to be associated with biopolitics, which manages the population through state mechanisms and technologies that regulate individuals' lives, behaviours, and health. It emphasises the state's role in safeguarding public health and maintaining social order by implementing measures that prioritise the collective good over individual freedoms.

Foucault noticed that the power shifted from the preoccupation of the *power of death* in the society of punishment to a *control society* that endowed government bodies with the *power over life* since the late 18th century (Mattery, 2002). He initially coined the terms *biopouvior (biopower)* and *biopolitique (biopolitics)* in 1976, which refers to his finding of this way of power exertion (Adams, 2017). *Biopolitics* is a distinctive feature in contemporary governmentality that exercises power over life. As Foucault (1978, p. 139) mentioned, *biopolitics* is the "management of population" where power is no longer focused on punishment over the flesh; rather, it is shifted to the living human bodies (Muller, 2011). The notion of power over life evolved in two basic forms: The first one is centred on the body as a machine, which focuses on the body's capacities and mechanics (Arnason, 2012). The second refers directly to the biological body. Foucault argued that disciplines aim to break down the population into individuals so that the individuals can be monitored, trained, utilised, and

punished. Yet the power over life sees individuals as a mass, which is influenced by processes of life such as birth, death, and disease (Zhang, 2015). It considers governance of the self, health and well-being, issues of longevity, birth and mortality, etc (Foucault, 1977). In comparison with the power of punishment that shapes and monitors human bodies, the power of life controls the entirety of lives (population). So it is the most significant characteristic of what he called *biopolitics.*

Biopolitics and biopower have manifested in the COVID-19 crisis since it began at the end of 2019. Government bodies have made efforts to control the transmission of the virus through calculative technologies. Data and computer science-based technologies, such as daily updated statistics of new cases and mortality, predictive models, and contact tracing apps, are only a part of the biopolitical means the governments employ. The government of England, for example, restricts citizens' movement (i.e. maximum of 30 minutes for outdoor exercises per day, international travel restrictions, and shutting down schools and businesses during lockdown) and requires people to keep social distance (Jayasinghe et al, 2021, p. 7). It is suggested that the UK government's approach of governing at a distance increasingly considers the individual as an autonomous agent (subject) who self-monitors and exercises his/her agency in order to mitigate external risks. Overall, these calculative means indicate a clear tendency of the biopolitical mechanisms of life management and governmentality.

3.3.2 Society of Disciplinary and Punishment

Disciplinary society was first coined by Foucault to describe a society under constant surveillance, which turns one into a docile body (Grad, 2019, p. 10). According to Foucault's original description, disciplinary societies are "whereas government is also a function of technology: the government of individuals, the government of souls, the government of the self by the self, the government of families, the government of children, and so on" (Rainbow, 1984, p. 256). In other words, this type of social structure is entirely under surveillance from a top-down model. The subjects/people of such a social environment "begin to internalise surveillance, and no longer resist" (Grad, 2019, p. 10). This type of governance is often times seen in places such as schools or factories. The excessive implementation of surveillance causes a significant power imbalance between the executors of surveillance and those under surveillance (Grad, 2019, p. 10). Besley (2002) points out that schools can be a specific example of a modern disciplinary society because of the fact that society sees young children as easily impressionable. Say, an elementary school in China

equipped school children with headbands to detect electrical activity in the brain, sending data to a teacher's computer for real-time monitoring of pupil's attention (Wang et al, 2019).

The disciplinary society can be traced back to long ago in human history. The old form of disciplinary societies appears to be that punishment was inflicted upon the body of the criminal primarily to emphasise the state power and to assure others that the defendant was guilty of the offence (Singer, 1979). For example, public execution or confessions on the scaffold. At the beginning of Foucault's *Disciplinary and Punishment*, he illustrates two gruesome scenes of punishment. One is the executor uses delicate and artistic torture to inflict affliction on the flesh of the captured regicide, and the second provides the readers with a constrained schedule in a Paris youth prison (Foucault, 1926). In these two comparative scenes, Foucault sees the revolution of the punishment system and the newly emerged morality of punishment. As he noticed, penal severity in the last 200 years has apparently been reduced. Punishments have become less cruel, less painful, more kind, more respectful, and more humane, which turned to "strike the soul rather than the body" (Foucault, 1926, p. 19). However, Foucault discovered that the reduction in penal severity was caused by the change in economic conditions and criminal activities in the 18th century. First, property relationships had become increasingly noticeable due to the improvement of productivity after the Industrial Revolution. Secondly, most of the criminal behaviours had been changed from violent crimes to economic crimes such as larceny, fraud, and other marginal crimes (Foucault, 1926). Punishments to defendants thus no longer stand in the way of using violence against violence.

Disciplinary societies and punishment still exist in the 21st century. As it is mentioned in the earlier paragraphs, state power has been transformed from the absolute power of deciding who should die to the power of creating better conditions for lives in the biopolitical governmentality. Modern societies rely much more heavily on technology as a tool of social control, while punishments have changed from imposing torture in a top-down model to one being responsible for his/her own actions under a set of rules and principles. It is likely to say that calculative technologies can help government bodies create a self-disciplined society.

3.3.3 Panopticon Theory

The panopticon theory has almost become a synonym for surveillance as it is the most commonly used metaphor for surveillance (Galic et al., 2017, p. 9). It was initially coined by Bentham in the 17th century, and the concept was further developed by Foucault as

panopticism. Bentham listed at least four types of Panopticons: the most well-known "prison-Panopticon", the "pauper-Panopticon" (designed for the housing of indigents but also for reformation and work), the "chrestomatic-Panopticon" (a Panopticon-shaped day-school, where one inspecting master could supervise pupils without being seen), and the "consitutional-Panopticon" (the gaze is reversed to oversee the rulers) (Galic et al., 2017, p. 9). Foucault's Panopticon is grounded on the description of the prison-Panopticon, which depicts a prison designed as an octagonal shape with an inspector in the centre tower who oversees prisoners in the cells (Galic et al., 2017, p. 10; Lyon, 1993, p. 3). It is an architectural idea as a "strategy of space", yet it results in a "new mode of obtaining power of mind over mind in a quantity hitherto without example" (Bentham, 2010, p. 15). In Bentham's time, surveillance was intrinsically restricted by physical limitations in comparison with electronic technologies today. The essential idea of building such a structure was to create "an extension of perception beyond visible locales and the reduction of temporal relations to spatial relations", so that the possibility of the disciplinary panoptic power could be enhanced (Božovič, 2010, p. 11). Surveillance in this mode allows the inspector to be perceived as "an utterly dark spot" that is an invisible omnipresence (Božovič, 2010, p. 11). The inspector is "all-seeing, omniscient and omnipotent' in the prisoners" perception (Galic et al., 2017, p. 10).

Foucault (2002, p. 70) uses the description of the Panopticon, specifically the prison-Panopticon, to theorise surveillance as "a type of power that is applied to individuals in the form of continuous individual supervision, in the form of control, punishment, and compensation, and in the form of correction, that is, the modelling and transforming of individuals in terms of certain norms". By following this definition, "panoptic" is involved with the concept of "seeing everything, everyone, all the time" (Foucault, 2006, p. 52). In the contemporary context, the rapid technological innovation has equipped the state with stronger and multidimensional capabilities to oversee citizens' activities not only from the behavioural aspect, but also their biological and psychological activities. Interestingly, Clarke (1988) coined the term *dataveillance,* which indicates innovative surveillance techniques on the basis of computational means and digital information. To some extent, Clarke's idea has foreseen the prevalence of electronic surveillance techniques, including biometric identification and datafication.

3.4 Deleuze's Society of Control

3.4.1 Concept of the Control Society

In today's world, the power has shifted from a system of punishment to a society of control, especially in a digital era in which control systems are significantly improved by combining with advanced technologies such as biometric identification and the Internet of Things (IoT) (Deleuze, 1992; Williams, 2015). In Deleuze's concept of the control society, power is no longer exerted through enclosed institutions, such as prisons or schools. Instead, through continuous and invisible mechanisms that permeate every aspect of life, people who live in such a society are disintegrated from individuals to "dividuals" (Deleuze, 1992). Control societies are empowered by technology for constant modulation. Thus, individuals are monitored and influenced in real time. Under this situation, the society is turned into a "bank" where identity information and social activities become masses, samples, and data stored in it (Deleuze, 1992). Nowadays, we can see an evident trend of datafication in our social life. For instance, in the use of biometric identification systems, physical characteristics of human beings such as facial contour, gait, voice, and emotional expression are digitalised for algorithmic analysis. Moreover, behavioural geneticists and security firms are trying to find out a common behaviour in a specific genetic expression in order to enhance biometric products with greater capability in criminal prevention (Kaye, 2006, p. 259; Burt, 2020).

Modern computation, positioning, and mobile phone technology make the capability of tracking device owners more efficient than ever. This feature can be utilised as a tool of citizen control during the COVID-19 crisis. For example, the HCS developed by the Chinese government plays the role of an indicator to show users colours based on their health status and travel history: A red code means the user is a confirmed COVID-19 case and should be in quarantine, while a yellow code identifies a suspected case that should stay at home (Davidson, 2020). These colours are also determined by the travel history of the holder (Davidson, 2020). Deleuze and Guattari's idea of the "electronic card" thus comes to the real situation during the pandemic.

The theory of a control society, hence, corresponds to the real situation to a large degree, specifically for China as a society of an authoritarian system. Deleuze's theory thus paves the way for this thesis to understand the evolution of surveillance technology. It could be helpful in the process of examining to what extent our society has met the characteristics of a control society.

In brief, taking Deleuze's control society as a theoretical foundation can help me to identify the phenomena, including biosecuritisation and datafication in the digital age. It is therefore worthy to take a deeper insight from an empirical perspective to seek how a control society is formed under different cultural, societal, and political contexts (see Chapter 4).

3.4.2 Society of Control and Datafication

Data-intensive logic and practices have converted qualitative aspects of life into quantified data over the past decade (Ruckenstein and Schull, 2016). The capacity to collect and analyse an individual's personal specific data (e.g. behavioural, geolocational, biological, and social activities) has become increasingly powerful and penetrated in many aspects of daily life, such as healthcare, education, and marketing (Ruckenstein and Schull, 2016). The proper definition of datafication in this thesis's context could be understood as a shift from traditional biometric data collection to big data collection, which has been endowed with larger volume, velocity, and variety by modern information technologies (Bansal, et al, 2016, p. 1).

The concept of datafication is a key element in surveillance studies. With the continuous development of modern computer science, data information has become more in demand in surveillance technologies. Personal preference, inquiry, social network, education background, emotion, and biometric characteristics can all be gathered actively or passively in the digital age (Adler-Bell and Miller, 2018). The datafication of society has extended the reach of surveillance from the monitoring of physical spaces to the monitoring of both physical and digital spaces (Galic et al., 2017, p. 36). In today's political and economic environment, data has become an essential source for marketing and policy making (Adler-bell and Miller, 2018). The term "surveillance capitalism", coined by Shoshanna Zuboff (2019), refers to the business model of technology companies, such as Google and Facebook, which monetise users' data collected from constant software surveillance. In the security industry, Deep Packet Inspection (DPI) is a typical surveillance tool that benefited from the powerful data processing capability of information and communication technologies that can help governments and security agencies to detect potential intentions of crimes (Fuchs, 2013). In short, datafication is a concept that attempts to account for how individuals are used as information sources for both business and policy government activities.

3.5 Surveillance Culture

3.5.1 Surveillance Culture in the Digital Era

Surveillance culture is a product formed in the process of exercising state power in obtaining citizen information across the country throughout history. Lyon (2018, p. 5)'s understanding of the term *surveillance culture* refers to "how watching has become part of a way of life". He notes that it is similar to George Orwell's idea in *1984,* which has posed a great attitudinal impact on not only "public understanding of surveillance but policy and legal responses to it" (Lyon, 2018, p. 5). His two notions on the characteristics of modern surveillance can fairly describe the situation in today's digital environment. The metaphoric notion of *liquid surveillance* shows the liquidity of modern surveillance as it has become increasingly fluid and hard to pin down. This idea noticed that modern surveillance has met Deleuze's foreseeable insight as it is "lesser a fixed, tree-like structure and more, a rhizome, a creeping plant with constantly reproducing underground roots" that is enhanced by the "broader mobility of capital, the flexibility of work and the digital information infrastructures" (Lyon, 2018, p. 6; Haggerty and Ericson, 2000, p. 614). The notion of *immersion* is linked with the *liquid* one, as he noticed that modern people are "submerged" in surveillance. The development of datafication and Internet-of-Things (IoTs) takes the immersion deeper, as data extraction from urban governance to business activities is inevitable in daily life. In this environment, data can be extracted from a variety of ways, such as wearable technologies, smart devices, sensors, and biometric identification.

In fact, it is interesting that the subjects in the contemporary system are not usually aware of being watched (Ganesh, 2016, p. 4). Surveillance might be better understood as *dataveillance,* as the presence of activists is weakened because of the shift from living surveillors to data-driven systems (Clarke, 1988, p. 5). Data collection cannot be shunned, and data collection activities have turned social members from physical bodies into intangible, abstract, and manageable information that can be utilised for multiple purposes. This information not only serves governmental activities but can also be used for other institutional responses, such as controlling a public health crisis.

3.5.2 Surveillance and Government Power

The nature of surveillance is an exercise of power and the performance of power relations (Monahan, 2011, p. 495). Early surveillance studies, for instance, (Rule, 1974, p. 40) revealed the ways used for data collection practices of large bureaucracies facilitate privacy invasion

and social control over individuals. According to his description, surveillance is "any form of systematic attention to whether rules are obeyed, to who obeys and who does not, and how those who deviate can be located and sanctioned". Marx (2002)'s foundational work on police surveillance shows how law enforcement agencies have increasingly used advanced technologies, from infrared cameras and CCTV systems to undercover recording devices and electronic monitoring, to gather intelligence and manage public order, often through covert or routine means. He contends that over time these technological advances outstrip the evolution of legal oversight, ethical standards, and procedural safeguards, leading to imbalances between state power and individual rights and increasingly normalising intrusive surveillance practices within democratic societies . Based on Deleuze's theoretical insight into the control society, Haggerty and Ericson (2000, p. 609) developed the idea of "the surveillant assemblage" which describes how bodies are translated into abstract data and then re-assembled as decontextualised "data doubles" in many information systems employed by organisations. Overall, scholars have probed that surveillance power is permeated in the digital age, which has become a new normal.

3.5.3 Surveillance and Political Culture

Individualist culture is a crucial condition of democratisation that is often bound with modern democracy (Kateb, 2003, p. 275). As it is explained in the above sections, the values of individualism and collectivism can differ in a nation's political culture, and people's perceptions of the issues of mass surveillance are different. Individualistic values emphasise anti-statism, and the equalitarian implications of pursuing the rights of man can further disintegrate a state power that needs to be enhanced through collectivist social behaviours (Swart, 1962, p. 79). Yet, all types of surveillance activities are more or less associated with state power on social control. The main metaphor for surveillance is not merely the Foucauldian panoptic and postpanoptic one in which surveilling agents are invisible. From the perspective of Weber, Orwell, and Marx, surveillance is "organisations watching individuals' with hierarchical and structural agents that repress individuals (Ganesh, 2016, p. 8). Nevertheless, both perspectives show the fact that any form of surveillance unavoidably contradicts individualistic values. Because the nature of surveillance itself is intrinsically a managerial practice of monitoring and managing individuals (Ganesh, 2016, p. 8). Clarke (1988, p. 498) notes that surveillance is "one of the elements of tyranny", which "conjures up unpleasant visions of spies, repression of individuals, and suppression of ideas". Surveillance

culture in the individualistic context, such as the UK and the US, is generally seen as a threat to democracy.

Individuals need to be able to enjoy freedom of expression, association, religion, and to be alone with their own thoughts without being overwatched by the eye of the state (Goold, 2010, p. 43). In the Western context, privacy is important to the maintenance of democracy as it ensures citizens hold elected government to account and helps to limit the excessive expansion of state power (Goold, 2010, p. 42). The main contradiction is that privacy is undermined in surveillance activities, and that individual autonomy and proper development of the self cannot be ensured (Goold, 2010, p. 41).

In comparison to Western individualism and democracy, the Chinese collectivistic culture can weaken the sense of "individual" that leads people to serve the interests of the group rather than themselves. Confucian ethics created a strict hierarchical order for social relations depending on age and gender, which requires that "the son must be submissive to his father and must care for his aged parents" (Park et al., 2005, p. 390). Park et al. (2005) point out that this mode can be extended to a social-political level where the Confucian ethics could have different effects on the intention of reporting wrongdoings among social relationships: it increases the chance of whistleblowing in horizontal collectivism, while it has no significant effects in vertical collectivism. This phenomenon, hence, can be seen as a direct factor in forming a surveillance state, since the obedience to authorities in vertical collectivism reduces individuals' sense of rebellion, whereas the intention of whistleblowing among peers is increased.

China may have a more subtle and complex situation than the UK. Because this country has a set of well-developed mass surveillance systems that other countries may not have, including using "big data" analysis combined with AI and the IoT, and the controversial Social Credit System (SCS), which first emerged in 2014 (Xiao, 2019; Botsman, 2017). The trend in China today shows intrusive data collection has penetrated both business and governmental activities. Yanhong Li, the Chief Executive Officer of the Chinese multinational Internet and AI company Baidu, said "people in China hold a more open attitude to private issues, they do not feel sensitive at all, and they are willing to pay for their privacy for buying efficiency, security and convenience" (China Daily, 2018).

3.5.4 Surveillance Culture and Its Persuasive Role

For understanding surveillance culture and its persuasive role, Fuchs' study on the case of Deep Packet Inspection (DPI) can be a typical example because DPI and digital contact tracers fundamentally share the same characteristics of digital surveillance, although the forms of the latter can be varied or even its surveillance characteristics are significantly reduced in some countries, such as the UK. DPI is a typical surveillance tool that benefits from the powerful data processing capability of information and communication technologies that can help governments and security agencies detect potential intentions of crimes (Fuchs, 2013). His study discovers societal and ideological impacts of Deep Packet Inspection (DPI) Internet surveillance and shows ideological explanations employed by sellers to justify their sales of surveillance products. He found that the ideological strategy used by security companies is to portray a society of crime and terrorism that needs to be controlled by Internet surveillance, and the institutions believe that algorithmic analysis is able to tackle such problems through detecting suspicious communicative activities on the Internet.

In the COVID-19 case, surveillance plays a vital role in measuring, tracking, predicting, and regulating bodies and pathogens. Wienroth et al. (2020) point out that biosecuritisation is developing fast while public health emergencies have been repurposed as security threats. Policymakers and governments tend to describe the control of contagion as dealing with security problems, so the action of causing privacy and liberty issues can be justified (Wienroth et al, 2020). It is noticeable that biometric digital solutions adopted in pandemic control are being re-appropriated to introduce and increasingly normalised as well as the prevalence of biosurveillance in tackling security issues (Wienroth, et al, 2020; Abergel and Magnusson, 2014, p. 6). Surveillance technologies in disease control have been justified through fear-based communication that people who are sceptical of surveillance would be distracted (Wienroth, et al, 2020).

Justifying surveillance power needs to reconsider the role of these techniques in specific situations, such as anti-terrorism. And for sure, governments and institutions should make efforts to emphasise how many benefits can be brought. In terms of the rigid concern on the threat to democracy and liberality posed by surveillance power, Mohana (2011, p. 498) gives a contradictory idea which considers surveillance can serve democratic or empowering ends if it "brings about openness, transparency, accountability, participation, and power

equalisation among social groups and institutions". For instance, Walsh (2010, p. 251) shows immigrant deaths near the US-Mexico border are well prevented by using geographic information systems (i.e. determining where to site water stations).

The positive side of surveillance practice, therefore, can be emphasised. Yet it is true that modern surveillance is based on technology, and technology itself does not have any binary oppositions, such as ethical or unethical. As Kranzberg (1986) said, "Technology is neither good nor bad; nor is it neutral". Following his comment, the modern surveillance system itself, as a product of technology, has nothing to do with ethical or moral concerns. Governments and institutions, therefore, can give these technologies positive meanings while minimising intrinsic threats to privacy and democracy.

To conclude, exploring the nature of surveillance technologies reveals a complex interaction between their practical use and the ethical concerns they raise. As I move into the discussion on ideology and political communication in the next section, it is imperative to consider how these technologies are framed within social norms and political discourses. The ideological basis of surveillance practices both reflects and influences collective beliefs, which in turn shape policies on the use of digital contact tracers during the pandemic.

3.6 Ideology and Political Communication

3.6.1 What Defines Ideology

Culture and ideology influence each other in a reciprocal relationship. Ideology often emerges from the cultural context of a group, developing from its shared history, language, and social practices. At the same time, ideologies can shape culture by promoting specific norms and practices that reflect their underlying principles (Geertz, 1973).

The concept of *ideology* first emerged in France in the late 18th century, and it is endowed with a range of functions and meanings that are especially related to aspects of mass communication (Thompson, 1990). Reisigil and Wodak (2017, p. 88) conclude Thompson's notion of ideology as it referred to "social forms and processes within which, and by means of which, hegemonic symbolic forms circulate in the social world". In the context of this thesis, the concept of ideology could be more likely close to Hamilton's (1987, p. 39) definition, which sees ideology as:

"A system of collectively held normative and reputedly factual ideas and beliefs and attitudes advocating a particular pattern of social relationships and arrangements, and/or aimed at justifying a particular pattern of conduct, which its proponents seek to promote, realise, pursue or maintain".

Karl Marx, one of the earliest thinkers to popularise the concept of ideology, described ideology as the set of ideas that reflect the interests of a dominant social class or group within a society (Marx, 1846). He argued how specific ideas act as tools of deception, concealing the exploitation and inequality that are built into capitalist systems (Marx, 1846). These misleading ideas are presented as natural or unavoidable parts of society, which help maintain the current order and protect the interests of the ruling class (McCarney, 2005). According to Marx, ideologies are also more than just deceptive ideas because they have tangible impacts. They obscure the true nature of economic relationships and support the dominance of the ruling class by promoting a distorted sense of reality, known as false consciousness (Marx, 1846; McCarney, 2005). However, Foucault presented a different view by exploring the relationship between power, knowledge, and ideology. He suggested that power is not merely a method of oppression used by one group to control another. Instead, it is a force that is present everywhere in society and plays a constructive role in shaping it (Foucault, 1977).

In both China and the UK, ideologies that shape surveillance culture and social control are influenced by three main backgrounds of each country: historical, cultural, and political. These frameworks guide how surveillance is implemented and affect the way it is perceived and accepted by the public (see details in Chapter 4).

3.6.2 Agenda-Setting and Ideology

Agenda-setting is a key concept in the field of Communication Studies, which deals with how the media sets the stakes for what is considered as important on the public agenda. Maxwell McCombs and Donald Shaw, who first developed the theory in 1972 when they examined the presidential election of 1968 and found a connection between issues covered in the press and problems the public regarded as necessary (McCombs & Shaw, 1972).

McCombs and Shaw, for their paper, also analysed the coverage in the media in Chapel Hill, North Carolina compared to public opinion polls in terms of which issues voters thought mattered most. They analysed the content of newspapers, television and magazines which were published under the aegis of mainstream media. Their poll tapped a random sample of undecided voters in Chapel Hill. They asked them to write down what they thought were the

primary issues of the presidential campaign. To enable them to compare these perceptions head-on with what was found in some media outlets over the same time period (McCombs & Shaw, 1972).

The findings indicate that the relationship between Media Attention and Public Interest is a straight line between the importance of issues to the public and the prominence of issues in the media. Because undecided voters were analysed in the study and as more influenced by news sources than other voter groups, thus vulnerable to the media. It proved that media does not just mirror the society in which they are found, but can create public opinion, focus attention, and construct political action (McCombs & Shaw, 1972).

The first level of agenda-setting, the focus of McCombs and Shaw's initial research, is the news media's capacity to influence the importance placed on specific subjects or issues. This level of agenda-setting states the relationship between the news media's focus on particular topics, as defined by the news story coverage, the play of stories, overall story presence in the news media, and what people view as important (McCombs et al., 1998). The starting premise is that the more the media discuss and make an issue conspicuous, the more importance will be given by the public to that issue.

Extending the foundational idea of agenda-setting, the second level of agenda-setting, referred to as framing, focuses on how the media tells us not only what to think about but how to think about it (McCombs et al., 1998). In layman's terms, it is the media framing of an issue that determines and shapes the public's perception about it. For instance, during an economic crisis, the framing would consider the data around unemployment rates, thereby creating the format in how the public perceives what leads to such an economic crisis. It involves cues which are subtle and much subtler. They come to a tone, or may be directed to what angle the issue brought into being or particular qualities of the concern (McCombs et al., 1998).

3.6.2.1 News Values as a Selection Mechanism in Agenda-Setting

Agenda-setting describes how embedded prominence in mediated discourse constructs what is valued by audiences, and the setting of particular features and interpretation angles is described in framing terms (McCombs and Shaw, 1972; McCombs et al., 1998). Another important step needs to be taken to explain how such issues can even be accounted for in the visible agenda. This stage is attended by news values. They refer to the practical editorial judgments and professional routines by which events, speakers and story angles turn into

publishable news, and through which some issues become repeatable and expandable over days and across various outlets. In their classical formulation, Galtung and Ruge (1965) include negativity, threshold, proximity, unambiguity, continuity, reference to elite nations and persons, and personalisation as conditions that promote selection and sustained coverage. Later studies have presented news values less as a fixed criterion, but instead as institutionalised production logics directing selection, story building and repetition throughout shifting media landscapes (Harcup and O'Neill, 2001; Harcup and O'Neill, 2017).

This matters for pandemic biosecuritisation, because surveillance governance produces multiple story possibilities that compete for attention. These include claims of effectiveness; assurances of legality; privacy controversies; enforcement and sanctions; technical failures; and narratives of harm. News values help explain why some of these travel further and persist longer. Negativity and threshold privilege crisis, danger, and breakdown. Continuity helps to keep the eye on rolling figures, variants and policy changes. Reference to elite nations and persons and personalisation elevate ministers, commissioners, scientific advisers and institutional spokespeople. Unambiguity distils complex governance questions into clear moral binaries, for example, responsible versus irresponsible and compliant versus non-compliant (Galtung and Ruge, 1965; Harcup and O'Neill, 2017). These pressures may compress the range of commonly available argument types. They also make certain legitimating frames less difficult to circulate, particularly those that package governance as urgent, essential, and manageable.

The introduction of news values is also relevant to deepening the thesis's model of the text as multilayered and mediated media, as even an analysis of government communication does. The Chinese corpus includes a broad range of state-media texts that reproduce official lines. Accordingly, we are unable to treat the material as a public window on state intentions. Repackaging of editorial content is in relation to a system of political management and organisational discipline; in this way, the news layer may increase mobilisation, oneness and cooperation but downplay the confrontation, while downplaying its visibility. That does not eliminate mediation, but the institutional conditions condition it.

The UK corpus is primarily based on the materials from gov.uk and NHS, so the texts are more likely to express institutional self-description in a direct form. Still, these documents are made for an external media ecology to consider. They also expect places of probable public conflict, notably privacy and trust, and are crafted to be defensible under journalistic and civil

society criticism. News values thus reflect why UK official communication constantly foregrounds voluntariness and privacy promises, as these are easy to report on, convey information transparently to the public, and are resistant to being sensationalised in media culture, which tends to value confrontation and failure as newsworthy (Harcup and O'Neill, 2017).

Methodologically speaking, this would mean two promises for the analysis. For one, texts need to be considered as recontextualised artefacts; what enters the corpus is already influenced by selection and packaging decisions, which can multiply certain discursive resources whilst pushing others to the margins. Second, cross-national comparisons between China and the UK should not consider "news" and "official documents" on the same level of similarity as their non-public domain counterparts. Government legitimation strategies can, in fact, still be analysed through both contexts, but it is imperative that this thesis must mark how selection logics, institutional norms and genres shape what is sayable, repeatable and contestable in each system.

3.6.2.2 Ideological Influence in the Agenda-Setting Process

Ideology takes centre stage regarding agenda setting because it impacts the selection of issues that media outlets choose to highlight and how those issues will be represented before the public. The ideology determines what the media outlets consider newsworthy or influential in general (McCombs & Shaw, 1972). It has a significant role to play in particular events, such as the promotion of digital contact tracers during the COVID-19 pandemic. Mass media may select and frame issues in support of policies and ideological predispositions of the government.

In China, media promotion framed the HCS as an indispensable means to control the pandemic that requires collective responsibility. Maintaining social harmony and stability collectively, as core values of both traditional Chinese culture and CCP ideology, is represented as a key ideology. This framing puts emphasis on technology that protects public health and allows for a fast resumption of regular economic activities (see Chapter 9, section 9.1.2). It also helps improve the image of the government as a protector of collective welfare. With this ideological framing, public acquiescence and little opposition, the technology became an everyday tool of the people, establishing it as a crucial tool in controlling the pandemic. This integration let the technology be framed not as an imposition but as a

necessary element of daily life, which buttresses collective health and safety efforts (see Chapter 9).

In sharp contrast, political and media discourses concerning the NCA in the UK were basically based on liberal democratic principles, so the focus was on individual rights and privacy protection. Repeated governmental, institutional, and media discourses addressed the concerns around data privacy and security, framing the app as a measure of opt-in — that is, the framing reflected public fears of being "watched" and losing further liberties to government involvement. In general, this framing is within the ideological frames of freedom and personal autonomy that are intrinsic in British society (see Chapter 8).

Chapter Conclusion

This chapter establishes the theoretical foundation for the PDA and CDA, supported by DHA, to analyse the promotion of biosecuritisation measures as a culturally and politically mediated practice. It outlines the crucial words, power logics, and communicative tools utilised in subsequent empirical chapters to interpret the empirical patterns.

In Section 3.1, I introduce that culture and political culture are historically situated resources that define the legitimacy of biosecuritisation. Surveillance in the UK situation is mostly presented as legitimate through liberal legality, voluntariness, privacy protection, and procedural oversight. In China, collectivist morality, hierarchical authority, and Legalist enforcement provide a vocabulary that turns surveillance into a necessity to order and collective security. Culture conditions the public intelligibility of surveillance, the boundaries of permissible criticism, and the terms of legitimacy.

Individualism and collectivism, in Section 3.2, are, as we see in previous sections, treated as cultural and political frameworks in discussion, not as determinants of epidemiological consequences. Responsibilisation makes compliance seem voluntary, ethical, and socially significant in individualist settings, via consent discourse, moralised choice, and trust. In collectivism-infused environments, mobilisation narratives present citizens as active subjects in structured public organisations and naturalise sacrifice as civic virtue. These orientations are not stable national characteristics. They operate as flexible discursive resources that can be reshaped or recombined in times of crisis.

Sections 3.3 and 3.4 create a power grammar which relates governmentality, biopolitics, and control. Governmentality in pandemic governance is the conduct of conduct. Biopolitics

explains why health, movement, and life become the targets of calculation and intervention. Deleuze's society of control captures the movement. Control operates through identifiers, thresholds, and feedback loops, enabled by datafication that turns political questions into technical ones.

In Section 3.5, it is stated that surveillance culture is a living condition of possibility. Liquid immersive surveillance normalises data extraction, so that crisis tools are presented as feasible and necessary. It also foregrounds surveillance as an activity of power, organisation in action, via classification and assemblages that result in "data doubles" power production.

Ideology, agenda-setting, and news values in the text section 3.6 to address the layered nature of the corpus. These indicate that texts in public discourse went through selection pressures and genre constraints. This is important for cross-national comparison, because Chinese state-media republication and UK official documentation exist within different media ecologies. In these strata, biosecuritisation relies on generating the illusion that surveillance is justified, bounded, and in the interests of the public.

Chapter 4 - Political Culture, Privacy Concepts and Surveillance Practice: A Historical Overview

Chapter Overview

This chapter provides a historical insight into state surveillance in China and the UK that is fundamental for later analysis of ideological strategies used in promoting surveillance technologies.

Section 4.1 looks at how historical events influenced the political culture of each country and how these events have impacted privacy concepts.

Section 4.2 discusses historical forms of state surveillance by explaining the social and political contexts, and then finds how much traditional means of social control have been inherited in responding to the COVID-19 pandemic.

Section 4.3 then goes on to explicitly explain how the conventional forms of surveillance have been upgraded into the current approaches used by each state.

The identified historical factors can provide a cultural-historical background for analysing political ideologies and social values represented in the promotion of digital and biometric surveillance tools during the COVID-19 pandemic by each country.

4.1 Characteristics of Political Culture in Each Country

4.1.1 Historical influence on the UK's political culture

Individualistic values are often associated with democratic culture in a general sense despite the relevance being variable in accordance with different situations (Kateb, 2003, p. 303) To empirically seek out what makes individualistic thoughts the major ideological values in the UK, it should mainly look at these three factors: historical social structure, economic transformation, and revolutionary events.

The idea of representative government was brought out after a series of bourgeois revolution movements since 1640 that led to the fall of the House of Stuart and the establishment of a Commonwealth (Vaughan, 1840, p. 258). During that time, productivity was astricted by the relations of production as England was still controlled by feudal landlords, while the influx of gold and silver during the Age of Exploration had largely increased the population and caused the general rise in prices from 1500 to 1640 (Greenspan, 2022, p. 46; Goldstone, 2016). The

continuous growth of population resulted in an excessive expansion of military size that brought on a financial crisis of the House of Stuart as a consequence of the extraordinary rise in military expenditure (Goldstone, 2016).

On the other side, the masses of the population consisting of dependent peasants could not be sustained above the poverty line, causing criminal rates and riots to rise sharply (Wrightson, 2000, p. 172; p. 145-153). It was inevitable that the monetary inflation and population growth intensified the inner conflicts among the upper classes, including the middle class, which consisted of merchants, artisans, apprentices, and workers. The bourgeois generally refers to the upper and middle classes, hence sensing a threat to social order that urgently needed to be tackled through a particular reformative prescription to protect property rights and social order (Goldstone, 1991, p. 127). They then borrowed a set of ideals from Calvinism, which later became the essential ideology of Puritanism. Calvinism advocates the doctrine of determinism, believing that whether rich or poor is determined by God's absolute authority and the predestined wealth cannot be changed by personal will (Burrell, 1960, p. 129). It emphasises the idea that the lower classes should be content with their "destiny" of being poor, while the bourgeois' interests should be well maintained as they are the "selected". In fact, the Puritan doctrine had met the bourgeois' urgent need to find a proper opportunity to overthrow the feudalistic system, which was intrinsically an ideological means for launching a capitalistic reformation to create a free competitive atmosphere (Goldstone, 1991, p. 121).

However, the historical backdrop of capitalist transformation in Britain is complex, much like cultural changes that vary based on a nation's unique ongoing circumstances (Werlin and Eckstein, 1990, p. 250). The revolution for the capitalist mode of production was triggered by a series of factors, including land transfer, new diplomacy, and imperialist policies. Moreover, the enaction of the Navigation Acts in 1651 was also a crucial historical turning point that greatly increased the capital accumulation of Britain (Farnell, 1964, p. 439-454). These accumulations boosted the Industrial and Agricultural Revolution after the 18th century. Therefore, the capitalisation of the UK had gained sufficient contextual factors mainly by taking advantage of the historical events mentioned above.

4.1.1.1 Liberal Culture and Cultural Complexity in the UK

The liberal culture is a characteristic outcome of capitalisation. It is conceptually associated with capitalistic political culture and vice versa (Paul et al., 2011, p. 27). Liberalism is a later termed idea by the thinkers during the Enlightenment in the seventeenth- and eighteenth

centuries that became a crucial philosophy in the modern political culture of Europe (Israel, 2001, p. 258-274). The original liberals believed individual liberty is the noblest persuasion that ought to be protected from government tyranny (Friedman, 1962, p. 182-189). Individualism was first developed in 17th-century Britain, setting a theoretical stage for modern liberalism (Locke, 2004).

Individualism itself is an ideological outcome that resulted in a series of reformative movements during the period of renaissance and protestant reformation between the fifteenth- and sixteenth-century (Walsham, 2015, p. 544-558). Martin Luther's reformative idea first allowed individuals to directly communicate with God instead of praying via the clerical power (Haemig, 2017). In this trend of thought, individuals are independent from the Church and state that the idea that one should be able to master his/her own life became the core values of later political ideology (Held, 2006, p. 14). Hobbes's proposition of modern individualism argued that one's action is determined by the consideration of self-interests. He argued that all individuals have equal rights to exercise their natural liberty, yet the social order must be maintained by a supreme power with a well-established judicial system to avoid conflicts (Held, 2004, p. 100). In classical liberalism, the value of the individual is emphasised as its core ontology that is always being employed as the universal value across morality, politics, economy, and culture in later social and political practice (Fine, 1992, p. 315).

However, while Hobbes introduced some aspects of individualism, such as the right of each individual to self-preservation, his overarching philosophy points out the necessity of a powerful state to maintain social order and prevent anarchy. This conceptual state, which often gets referred to as "Leviathan", is in fact a sovereign power restricting natural freedoms in order to preserve stability and security (Hobbes, 1894). He considered a strong and centralised authority, in contrast to classical liberal principles that advocate for minimal state intervention and prioritise individual liberties. This contraction implies the nature of power, which is one of the most interesting findings of the analytical chapters (see Chapters 9 and 10) since state power can turn to act in a more authoritarian manner when urgent solutions for public crises are needed.

Furthermore, British political culture is influenced by a complexity of ideologies beyond liberalism. Socialism has played a significant role in forming political policies and the social welfare systems in the UK. The starting point of socialism in the UK could be found within

the Chartist movement in the 1830s and 1840s, as it was for such political reforms that might be described as socialist, including universal male suffrage and the redistribution of power from the aristocracy to the working class (Thompson, 1963). The Chartists' establishment of this social, political structure ultimately cleared the way for later socialist activity by both mobilising the working class and bringing them a formal political experience (Thompson, 1963). In the late 19th century, the foundation of the Fabian Society marked a significant development in UK socialism. The Fabians made a case for the slower and more progressive means by which socialism was to be attained. They shaped public policy and lent intellectual momentum to the Labour Party, founded in 1900 (Pease, 1916). The Labour Party, originally a union of trade unions and socialist organisations, became the principal instrument of socialist politics in Britain. Labour-built NHS, extended state education and welfare benefits in the post-war period, demonstrate socialist principles applied by reducing social inequalities and all citizens receiving universal benefits (LSE BPP, 2017).

Despite these influences, the UK ultimately embraced a liberal democratic system, mainly due to its historical development and philosophical tradition rooted in the Enlightenment ideals of individual liberty, democracy, and the rule of law. Over the course of the 19th and early 20th centuries, liberal democracy was slowly given a more equal franchise and a stronger parliamentary democracy followed; thus, this had the effect of anchoring liberal democracy as a primary mode of governance (Bogdanor, 1987, p. 34-52). It was considered the best option of both ensuring individual freedoms were harmonized with collective rule, promoting a market economy and various other social progress.

Moreover, British liberal democracy was influenced by practical needs, evolving over time to integrate aspects from various ideologies, such as socialism, to tackle social challenges and disparities. According to Kavanagh (1990, p. 142-159), this type of flexibility helped maintain stability and prevented the extremes of both unregulated capitalism and comprehensive socialist governance. This could be seen as an important component in continuously gaining the public's confidence and, consequently, allowing this trend to result in a legitimate political system. The UK is thus able to deal with modern challenges in governance effectively while still maintaining core values associated with liberal democracy.

The gradual establishment of a liberal democratic system in the UK can be traced back to the signing of the *Magna Carta*, which fundamentally limited the monarchy's authority while ensuring the barons and churchmen's power (Passant, 2016, p. 68). Magna Carta was "above

all about money", according to Carpenter (2015, p. 24). Its overwhelming aim was to restrict the king's ability to take it from his subjects. It stated that taxation could never be demanded without the general consent of the leading barons and churchmen (Breay and Harrison, 2015). Meanwhile, a mechanism was designed to "redress the wrongs of John's government and prevent their recurrence" that endowed it with a constitutional function (Starkey, 2015, p. 17). A critical reason why the *Magna Carta* is considered to be the cultural foundation of liberal democracy is that the ordinary people also played an essential role "both as support for their "betters' and as fighters themselves for a better world" (Passant, 2016, p. 70).

Therefore, it is clear that the UK's traditional political culture was formed in a series of specific economic and political contexts. These historical movements were intrinsically raised to maintain the bourgeois' interests by abolishing the feudal system. The political culture of the UK was developed on a complex basis and involved two historical events: the issuing of the *Magna Carta* and the Puritan Revolution. After that, the liberal culture was born in the progress of capitalisation, and its core value aims to put individual interests in the first place. It advocates a free, competitive market without interference from the monarchy's power. In such a political culture today, the government's power can be limited as much as possible to ensure its citizen's rights. It helps to restrain excessive government power by its constitutional mechanism.

4.1.2 Historical Influence on Chinese Political Culture

Unlike the UK, China, in its historical-cultural development, did not experience a series of economic, political, and ideological transformations in the past few centuries. Until the fall of the Qing dynasty in the early twentieth century, the feudal system and peasant economy remained unchanged for over 2500 years since the birth of Confucian ideology led ancient China to systematic feudalism in the first half of the Eastern Zhou period (Csikszentmihalyi, 2020). To reveal the key ideologies of power exertion in the Chinese tradition, it should be noticed that the idea of *xiao* 孝 (filial piety) in Confucius's teaching contributes to the core value of authoritarian ruling over the history, even its vestige still can present in the contemporary Chinese power relations (Hershock and Ames, 2006, p. 66). *Xiao* specifies moral norms that require the child to have a fundamental obligation to support, please, and succeed the parent, especially the father, in patriarchal relations (Bedford and Kuang, 2019). This norm, to be exact, is an extension of ancestor worship in ancient China. Confucius' era was a time of chaos and feudal conflicts; therefore, he refined prevailing beliefs into a

practical philosophy to maintain harmony from family relations to the broader society (Bi and D'Agostino, 2004, p. 453; Bedford and Kuang, 2019).

Social relations in the Confucian hierarchy are highly restricted by the doctrine that "the ruler is the ruler, the minister is minister, the father is father, and the son is the son" (Bi and D'Agostino, 2004, p. 453). The social values it established strictly indicated the proper duty in accordance with their status in specific social groups, which the father should be virtuous and perform as an example for the other family members, while the son should fulfil his father's wishes and honouring the father (Bi and D'Agostino, 2004, p. 453). It is conceptually similar to Roman pietas, which indicates a strong loyalty towards the Gods, fatherland, parents, and friends (Emilie, 1944, p. 536). However, the difference between *xiao* and Roman pietas is distinctive, as *xiao* does not merely come with a single concept of being loyal to the parents. The whole idea of Confucian filial piety is termed as *xiao* (filial) and *shun* (obedience), which, according to Confucius, is "not being disobedient" (Legge, 2011, p. X). In addition, this moral obligation also forbids the son to accuse the father of misbehaves but must conceal his wrongdoing and protect his reputation, despite Confucianism strongly suggesting the importance of example (Bi and D'Agostino, 2004, p. 457).

Nevertheless, Mencius' teaching allows a filial son to go against his parent's continuous misbehaving by kind persuasion so that he still can be a filial son (Mencius, 4B:30). The doctrine of Confucian filial piety, in the Chinese political culture, was not only the moral obligation in maintain familial harmony but it was also extended to the level of loyalty towards the sovereign. According to the *Classic of Filial Piety*, "Filial piety at the outset consists in service to one's parents; in the middle of one's path, in service to his sovereign; and, in the end, in establishing himself as a mature man" (Ctext.org). In the Chinese history of governing, the government's role was equalled to a "parent", and government officials were called *fumuguan* 父母官 (parent-officials) (Fraiberg et al., 2017, p. 193). This, according to one of the Confucian books, *Great Learning,* ideally meant that government officials should act like entrusted parents to take care of people and establish a good example (Fraiberg et al., 2017, p. 193). Yet, in the real practice of governing, it caused the Chinese government to manage a broad spectrum of matters in people's lives (Fraiberg et al., 2017, p. 193). The doctrine of *xiao shun* is deeply embedded in the Chinese political culture. Schwartz (1973, p. 570), in his review of Solomon's research about filial piety in Mao's revolution, pointed out that the prevalence of a "dependency orientation" is rooted deep in "an overwhelming fear of conflict and disorder and an obsessive concern with peace and

harmony". Although the modern Chinese political culture has been changed through a series of political revolutions since the fall of the Great Qing Empire, especially after the CCP took the regime from the Kuomintang (the Chinese Nationalist Party) in 1949, the values of *xiao shun* still can be found in real political practice that is used to enforce its authority. For example, China Central Television, the mouthpiece of CCP, published a special webpage 我们最可爱的父母官 (*Our Lovely Parent-Officials)* to praise the government officers' response during the 2008 Sichuan earthquake (CCTV, 2008).

Therefore, when discovering the historical influence on Chinese political culture, the role of *xiao shun* is considered to be a core idea that created an ideological foundation for Chinese collectivism. To the extent of understanding collectivism in the Chinese context, it is interesting that the modern concept of collectivism may be different from the traditional Chinese political culture until the CCP took power. Modern collectivism in China, to be specific Marxist collectivism, was initially brought by the socialist revolution, which is conceptually different from the traditional one (Chen, 2013). The Confucian collectivism is based on a patriarchal relationship that is morally distinct from the socialist collectivism. Social members in the other collectivistic forms are required to unconditionally submit to the group, while Confucians do not believe the family or state can ever exist without the component of individuals. Confucian teaching regards the members of a society should submit to the state order in the way of *xiao shun*. The moral duty of being *xiao shun* is extended to the other kinships and social members (for those who have higher social status), and ultimately reaches the state level that formed patriarchal collectivism (Chen, 2013).

The core values of Confucian collectivism have largely remained in the dramatic shift of the political system and economy in the twentieth century. There are three reasons. First, the Confucian teaching emphasises the value of 崇公抑私 (Support the public interest, suppress the personal interests) (Chen, 2013, p. 27). It denies individual interests and regards personal ones as ethically wrong. 私 (self, selfish) in most of the classic books is defined as an ethical issue that is the root of all evil. For instance, the terms consisting of 私, such as 私欲 (selfish desire) and 私利 (selfish interests), are semantically related to selfishness as an ethical problem that must be rejected (Chen, 2013, p. 27). This characteristic shares similarities with the idea of socialist collectivism, in which the latter believes that both society and individuals can benefit from a cooperative economic system.

However, the relationship between communist policies and traditional Confucian ethics is nuanced and depends on context. Although Confucian collectivist values parallel those of socialist nations like the former Soviet Union, the nature of such traditional values under a communist regime may be qualitatively different. The Communist Party in China has pursued Confucian values to legitimise its ideological authority. The Party focuses on promoting social harmony and obedience, which are in line with their governing style (Bell, 2008). A distinctive feature of presidential quotations by Xi Jinping is his thoroughgoing emphasis on the *Four Books*, particularly Confucius's *Analects*. Xi Jinping said, "We must never discard the excellent cultural traditions of the Chinese nation, as they are the 'roots and soul' of our ethnicity. Without these 'roots' and 'soul,' we would be without foundation" (Fu, 2013). Whereas during the initial phase of the Soviet Union, Lenin's response involved a blatant rejection of traditional forms of religious and ethical systems, including the rejection of established hierarchies and moral codes that were viewed as bourgeois remnants divorced from socialist ideals (Fitzpatrick, 1999).

4.1.2.1 Failures of the Chinese Nationalist Party

Last century's war and economic realities also contributed to the reason the Chinese state became dependent on and adopted a collectivistic political culture throughout history. The early 20th century saw many, if not most, wars and failed bids for democratic reformations in China after the collapse of the Qing Dynasty. These tumultuous periods, marked by the Warlord Era and the subsequent civil conflicts, rendered major, deep losses to the nation's structure and its very existence, while preparing the way for radical political movements to follow (Waldron, 1991). The Chinese Nationalist Party's dominance in power meant the Republic of China was unable to be stabilised by a combination of economic, political, and military difficulties. Chiang Kai-shek, leader of the Nationalist government, struggled with great difficulty of consolidating the government, reforming and stabilising the economy. As Fairbank and Goldman (2006) suggest, this Nationalist government was plagued with corruption, which robbed them of their legitimacy and its ability to govern effectively. The government's failure to address poverty and economic disparity worsened social unrest, especially in rural areas where most people lived in poor conditions (Eastman, 1986). Such failures of governance bred anger and unrest among the Chinese. From this point on, these conditions created space for the CCP to grow into an influential party, making promises of social order and social reform (Fairbank and Goldman, 2006; Meisner, 1999).

Nevertheless, when the CCP won the civil war against the Nationalist government and came to power in 1949, the country was facing a severe food shortage that 7 per cent of the world's arable land needed to feed nearly one-fourth of the world's population (Mobo, 2019, p. 37). An urgent solution for helping the massive population to survive hence was carried out by the CCP by launching a series of violent land seizures to emancipate the peasantry from their oppressive landlords (Hinton, 1966, p. 128). In the mid-1950s, the CCP finally concluded that collective farming was the most rational approach to address macroeconomic development and help the majority, which consisted of poor, illiterate peasants, to survive (Mobo, 2019, p. 38). The collective land ownership mode has prevented land transfer from the poor to the rich, which has stopped the recreation of class conflicts in the countryside (Mobo, 2019, p. 38).

Nowadays, when Confucian collectivism met Socialist collectivism, the hierarchical doctrines exerted their function in order to unify and motivate the vast population for China's country-wide development (Mobo, 2019, p. 38). Although today's China has experienced a capitalistic transformation since the post-Mao era under Deng Xiaoping's leadership beginning in late 1978, following the end of the Cultural Revolution, the country has still retained a socialistic economic mode. This approach is, in fact, similar to the Soviet Union's "state capitalism" (Baston, 2021, p. 9). To be specific, the CCP's state capitalism has entirely inherited the mode of the CCCP as "the state-owned enterprises operated alongside private businesses within a market economy supervised by the Communist Party" (Baston, 2021, p. 9). This economic and political model is called "socialism with Chinese characteristics" (Deng, 1984, p. 11).

Today, the political culture in China is a mixture of ideology and economics, as the following 3 features define it: 1) Confucian collectivism, 2) Socialist collectivism, and 3) State capitalism. And one implication of this combination is that a transition from a peasant-based to a capitalist economy is missing. This gap has generated a culture where individualism is not prevalent. Indeed, in less than fifty years, the transition from feudal society to state-administered authority with the emergence of the Chinese Communist Party (CCP) can be explained by ancient hierarchical structures that emphasise social order and collective progress. Culturally, political practices have remained relatively stable as well, as the CCP still holds a state-run economy as its main policy objective and does not allow private owners to act autonomously as regular capitalists. The cases like Ma Yun of Alibaba and other successful private owners face heavy fines in the field of regulation shows this phenomenon.

For instance, a $2.8 billion fine had to be paid (Olsen, 2021) for violating antitrust laws. These elements are precisely what made China an exceptionally collectivist nation.

4.1.3 Cultural Influence on Privacy Concepts

The above sections have basically explained the mainstream political ideology in each country from a historical perspective. It is clear that the UK's individualistic circumstance is a product that occurred in several reformative events throughout the centuries. Yet China has largely maintained its hierarchical tradition of Confucian collectivism due to the absence of gradual capitalisation progress, which takes generation to generation to form a cultural-ideological tradition. Meanwhile, the country was also influenced by the collectivistic ideology of the Communists. These cultural forms have influenced each country's political practice, which has caused differences in personal liberty and privacy. Therefore, it is essential to compare the main factors which led to the differences.

Warren and Brandeis (1890) define privacy as the right to be secluded that should not be interfered with or invaded. Westin (1967) defines privacy concern as "the desire to keep personal information out of the hands of others". He suggests four states of privacy: 1) Solitude, the state of being free. 2) Intimacy, the seclusion required for a close association. 3) Anonymity, the condition of being unknown and free from identification. 4) Reserve, the desire to limit disclosures to others (Rizza, 2011, p. 9). According to Rawls (1971, p. 45), privacy concerns are believed to be associated with the right to have some form of personal property, and they shall be protected as an essential component of basic liberties. He suggests that individuals have the right to seclude themselves and keep their beliefs, knowledge, feelings and ideas to themselves rather than being obliged to share them with others (Rawls, p. 45; Lever, p. 47). However, Rawls did not relate privacy to the ideas of property ownership as both objections to privacy are close to his belief that can be addressed by justice to protect the claims of liberty and equality (Lever, p. 47).

In the Western philosophical tradition, the concept of privacy itself does not link with either collectivism or individualism. Aristotle distinguishes the public sphere (*polis,* which refers to the public sphere in political activity) from the private sphere (oikis, which refers domestic life and one's family) and assigns virtues to each sphere (Dowding, 2011, p. 1). Ardent (1998, p. 28) points out that privacy has become a blurred concept under the development of Western society. Her explanation regards the emergence of the "social realm" is "neither private nor public", which is "a relatively new phenomenon whose origin coincided with the

emergence of the modern age and found its political form in the nation-state" (Ardent, 1998, p. 28). Swanson (1992, p. 2), in contrast, defends Aristotle's concept by admitting that "human beings carry virtues earned in private into the public, whereas the human propensity to cherish what is one's own and desirable protects the private from being corrupted by opinions learned in public".

Aristotle and later scholars have yet to take the relationship between culture and privacy into account (Yao, 2022, p. 267). Studies on information privacy have shown the degree of privacy awareness is associated with individualistic environments (James et al., 2017, p. 863; Sandra et al., 2000). This thesis thus sets aside the studies that looked at privacy concerns from the public's perspective, as they only focus on the government's reactions to different cultural contexts.

4.1.3.1 Differences in Understanding Privacy

The understanding of privacy in Western values is subtly different from the Chinese context. In fact, there is neither a philosophical nor sociological definition of privacy in modern Chinese academic contributions from a Chinese perspective on the nation's own historical and cultural context. Chen (2007) found that many scholars think that the Chinese do not have privacy. There are mainly two reasons. First, by looking up the term 隐私 (*yin si, privacy)* in the standard Mandarin Chinese dictionary *Cihai*, it is defined as "things that cannot be told to others" and "shame that one is not willing to be discovered". Second, there is no actual legal protection of privacy rights in China's constitution, despite some other legislations, such as the tort liability law and consumer protection law, that have mentioned the legal protection of personal information (Chen, 2007, p. 237). Hence, from a comprehensive perspective, the concept of privacy does not have the same understanding in each country's own definition. The sense of privacy in the Chinese context refers to specific behaviours, generally related to shame and guilt, rather than a wide range of individual rights in a private sense that should be protected as a component of basic human rights. Privacy in Chinese values has never been considered from the perspective of legal protection, while the Western value of privacy indicates it is the right to avoid one's personal life being interfered with by others or the right to avoid one's personal affair being known by others without consent.

Under the influence of individualistic culture and liberal ideology, the UK's legal protection of privacy is considered to be a necessary part of human rights (Omrani and Soulié, 2017, p.

5). Omrani and Soulié's research (2017, p. 16) on measuring the relation between individualistic culture and privacy concern has indicated that the UK, which is rated to have the highest individualistic level, has been found to have the largest privacy concern among 26 European countries. This degree of private awareness across the country may have urged the UK legislation to enforce relevant laws to protect privacy, especially personal information on the Internet. Sir Kenneth Younger prompted the earliest development of Data Protection in the UK in the 1970s and became a basic standard for all later data protection legislation, as the growth in computer usage posed risks to personal information (HM Government, 2017, p. 4). Furthermore, the UK also makes an effort to retain an international leading role in data protection (HM Government, 2017, p. 7).

Privacy rights, according to Article 12 of the *Universal Declaration of Human Rights,* declared that "no one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks" (UN, 2015, p. 26). This idea, from a universal perspective that is different from the traditional understanding of privacy in China, is a very late introduced legal concern until the Personal Information Protection Law was passed in 2021 (Gov.cn, 2021). The absence of privacy concerns in China, to a large extent, is a result of the collectivistic environment and considering *yin si* as a morally evil thing in Confucian culture. As a matter of fact, the introduction of private property and rights to privacy in China has merely been noticed in recent decades. For example, privacy issues have been debated for the first time at the beginning of the twenty-first century by readers and journalists, such as whether parents have the right to read their children's diaries or whether they can photographs be used commercially without authorisation (McDougall, 2004).

In conclusion, a distinctive difference has been found in defining privacy in each country. To be specific, the terminology and meaning of privacy are not the same thing in each culture. In the UK, it is a virtue of protecting one's own realm and life from being interfered with by others. In China, it still remains a traditional pattern of considering *yin si* as a behaviour of hiding shame and guilt that one does not want to be discovered. This can be a reason of why the right of privacy protection is being introduced very late in China.

4.2 Historical Forms of State Surveillance

4.2.1 Historical Development of Surveillance in the UK

The history of this country's surveillance practice can be traced back to the nineteenth century, as we have briefly introduced some of the early means, such as implementing civil registration in Chapter 2. Evidence has shown that the formation of the information society started in the 17th century Britain. Here we take a deeper insight into the cause and practice of state surveillance in the UK and discover the details of historical surveillance systems.

Britain is acknowledged as a surveillance state and is one of the largest exporters of surveillance technology, including phone-hacking technology, spyware and facial recognition software all over the world (Egret and Anderson, 2021, p. 2). The old form of state surveillance means is focused on espionage physical information gathering through recording census data and statistics (Egret and Anderson, 2021, p. 4). These types of state surveillance in this country's history have a strong relation with colonialism as the British state intended to monitor, control, manipulate and divide communities in its colonies, such as implemented mass surveillance of the Irish population after the 1798 Irish rebellion (McQuade and Neocleous, 2020).

Information collection held on citizens in the modern central state of the UK has a limited range of functions, including taxation, welfare offering, crime prevention, the general identification of citizens and state employees, and property rights protection (Higgs, 2001, p. 176). The pre-modern state in England was a dispersed "organic" polity which lacked a state bureaucracy, unlike imperial China or Rome (Higgs, 2001, p. 176). Hall (1985, p. 138) indicates that the governance of the realm was undertaken by local power elites, and the Crown agreed that the representatives of the landed elites would work for justice and oversee the poor. The middle class of farmers, craftsmen and superior villagers were ruled under the parish via church vestries, manors, and borough courts (McIntosh, 1998). Since the 1530s, the monarch became the head of the Church of England, regulated marriage and local morals (McIntosh, 1998). Yet the Church bureaucracy was localised as well, and the monarch was responsible for guaranteeing social cohesion and internal pacification (Higgs, 2001, p. 177). The local elites gained authority and power from the Crown to exert surveillance for extracting taxes, sorting out crimes, and against poverty (Griffiths et al., 1996).

Surveillance culture in the UK has been influenced by the development of the Information State in England, known as the statistical movement of the 1830s and 1840s, as a part of the

reaction to the rapid population increase brought about by the industrial revolution (Metz, 2008, p. 272; UK Parliament). Giddens (1986) found the earliest stage of the development was followed by the first national census, which took place in 1801, and the establishment of civil registration in 1837. The initial system simply included names, until more detailed information, including gender, age, occupation, birthplace, marital status, medical condition, and relationship to the head of household was introduced in 1841 (Higgs, 1989, 114). However, civil registration in the UK was not purposed to maintain the central state's power – it was purposed to fulfil the need to tackle poverty, giving individuals information to allow them to decide where to live, how to invest and seek occupations (Higgs, 2001, p. 182). Another significant reason for building such a system is to use the population data to help maintain electoral registers, which can maintain equitable electoral boundaries (Higgs, 1996, 298). The function of civil registration and census, as has already been mentioned in Chapter 2, also recorded moral statistics, including suicide, delinquency, and divorce. etc. (Higgs, 2004). The *Births and Deaths Registration Act* became compulsory by 1874 in England, and it is stated that anyone who has not fulfilled the obligation "shall be liable to a penalty not exceeding ten pounds" (Legislation.gov.uk).

In brief, these early forms of state surveillance in the UK were carried out at the end of the eighteenth century and the middle half of the nineteenth century. There are three main functions of them. First, civil registration and census aimed to help the Crown to collect taxes from parishes. Second, they are responses to the increasing population after the Industrial Revolution. Third, espionage and information harvesting are used to maintain the stability of the British colony. There have been fewer functions for these systems to play the role of monitoring their citizens, which are used to strengthen the power of the central state.

4.2.2 Population Control in Chinese History

The emergence of the census and civil registration system in Chinese history is much earlier than in the UK. The earliest development of mass surveillance can be traced back to the Spring and Autumn Period (770 to 476 BC) and the Warring States Period (475 to 221 BC) (Tian, 2007, p. 54). Huji, known as the initial practice of the census register system, was formed following the establishment of the nation which aimed at moralisation, economic exploitation, and personal control over the realm (Tian, 2007, p. 54). It is an important population management system based on a military-style enlisting mode for the dynasty to collect tax, manage migration, and implement regional administration (Yang, 2011, p. 1). Tian (2007, p. 54) points out that the patriarchal clan before the Spring and Autumn Period

was changed to prefecture-country politics so that the census system was carried out to record the families in units for central control. The civil information recorded in the Huji system is complex. *Feng Zhen Shi* (Forms for Sealing and Investigating), an unearthed bamboo slip discovered at Shuihudi Qin Tombs, shows a detailed census record of a registered citizen that included his family members, clothes, cattle, house structure, number of trees around the house, marriage status of children, details of servants, the height of his son, physiological features of him and all the registered individuals (Tian, 2011, p. 56).

Despite this system being functionally similar to what it is in the UK, the details and regulations of the Huji system show an extremely authoritarian tendency in its practice. After the Qin Dynasty took power in 221 BC, Huji became a more restricted register system. According to the unearthed *Fu lü* (Statutes on Enrolment), the migrants would face heavy fines if they did not fulfil the obligation of reporting their move to the local authorities (Yang, 2011, p. 4). When the Han Dynasty came to power in 202 BC, the details of Huji registration added more regulatory details including the division and inheriting of properties and administrative instruction for local officials.

In comparison with the UK's historical civil registration system which functioned as a way for tax extraction and electoral registers, sometimes collecting information on its colony, China's Huji system has more meaning of control rather than administrative operation. *Hu lü* (Law of Citizen Registration) also requires the neighbours to discover crimes and misbehaviours each other, which inherited the regulation set during the Qin's Shang Yang Reforms (390 – 338 BC) that the residents have an obligation to report their neighbour's criminal behaviour, or the whole unit (made up with up to 15 residents) shall face punishment as same as the criminal, even the persons who covered up the criminal can be executed (Yang, 2011, p. 7). However, this had been changed to merely imposing fines after the Han Dynasty (Yang, 2011, p. 7).

Gao (2003) points out the historical Huji system had a core function of population control that was designed to limit migration. In ancient Chinese dynasties, the empires made efforts to use various means for registering citizens to the Huji system as much as possible in order to limit their migration. The age of the Ming and Qing Dynasty is seen as a social and economic transformation because of the influence of the international trade boom between 1500 – 1800 (Hung, 2001, p. 473). This caused the role of Huji to gradually lose its function due to the continuous development of the social economy, causing it to become more

sophisticated in migration control by the Ming Dynasty (1368 to 1644) and Qing Dynasty (1644 to 1911), while its military enlisting mode can no longer work as before (Gao, 2003). Nevertheless, the trend of migration was hard to entirely prevent as the whole economic environment required more population movements for commercial activities

China was suffering from wars and chaos in the first half of the twentieth century. After the founding of the PRC in 1949, what the people and the central state most demanded was a stable way of maintaining order and peace. When the CCP's political strategy shifted from the rural areas to the cities, they were facing a series of tasks – establishing public order, recovering industrial production, suppressing inflation, and dealing with unemployment (Lu, 2002). In the year of 1950, the Public Security Bureau drafted the bill of "special population management", aiming to monitor and control the "counter-revolutionaries" or "suspected individuals" in order to "secure the public safety" and gain population information for state administration (Lu, 2002).

The old form of the Huji system has been fully adopted and improved in accordance with the contemporary situation from 1951 (Chan and Li, 1999, p. 819). In the beginning of the 1950s, residents in the countryside were allowed to move into and out of the cities across China (Chan and Li, 1999, p. 820). Yet the overwhelming influxes of peasants into cities turned into a severe burden to the central government, forced it to promulgate the first set of Hukou, which has the same meaning as Huji, to stop the migration flow of rural labourers (Chan and Li, 1999, p. 820). This innovative register system granted the state agencies greater powers in controlling citizen's migration mobility through a set of regulations of migration permits and recruitment/enrolment certificates (Chan and Li, 1999, p. 820). The system has been simplified only to record one's Huji type (urban or rural), legal address, sector of activity, religious belief, and physical description (Boquen, 2022).

With all that in mind, the functions of the Huji system have changed a lot, but it still keeps its core function of population control from the Spring and Autumn period to the PRC. This system, in comparison with the UK's census and register system, has its specific purpose of limiting migration movements and enabling social control. It has been adopted by the CCP government to build an essential database for population management and practice surveillance.

4.2.3 Role of Traditional Systems in Responding to COVID-19

By looking at the historical forms of state surveillance, the differences shall be concluded, as the early development of surveillance history in the UK is later than it is in China. There have been seen some similar characteristics in civil information gathering in both systems that, whether the UK system or the Chinese system, which require details of personal information, not only including the name, age, and sex, but also registering the citizens' occupation, marital status, and physical and medical condition. One of the main differences is that the UK system does not include how many properties the person owns, despite it being designed for taxation as one main purposes.

In the contemporary era, both China and the UK have, or at least attempted, to establish a centralised national identity management infrastructure. The Identity Cards Act was proposed by the UK government in 2002, yet abandoned in 2010 (Beynon-Davies, 2011, p. 12). This act established a legal framework aiming to build a National Identity Register for issuing ID cards to registered citizens (Beynon-Davies, 2011, p. 12). This act was finally abandoned as its negative impact of resulting in a surveillance society was more remarkable than its initial purpose of bringing public services benefits such as medical care and crime prevention (Davies, 2011, p. 15). In China, the country's ID system was established in 1984, and all citizens above 16 years old with Chinese nationality must be registered and obtain an ID card (Baike). The fifteen-digit ID code remains unchanged until death (Baike). By the year of 2013, fingerprint identification was rolled out for the second generation of ID cards, which further improved its anti-counterfeiting mechanism (Yicai, 2013). This has become a turning point of the biometric age in the Chinese state surveillance system.

By looking at the smartphone applications developed for pandemic control during the COVID-19 crisis in each country, it can be seen that some of the traditional systems have been adopted with modern technologies. So far, there is no evidence showing the UK's NHS contact-tracing app is using any form of centralised contact-tracing model, as its initial centralised mode was scrapped (ORG, 2020), despite having a postcode-based responding function that is used to send risk alerts by postcode district (NHS, 2020; Levy, 2020). For more details about its operation mechanism, security issues and solutions, see the later section of 5.4.2. For the use of the traditional census, the Census 2021 in the UK launched in March 2021, was specifically focused on comparing how much impact the pandemic has had on this country, including the understanding of mortality for different groups during the pandemic (ONS, 2021).

China's pandemic control is more likely to be presented as a comprehensive surveillance approach that has inherited the old forms of population control. The HCS has a centralised data-processing system that is built on the real-name authentication system, which is an extension of the Huji and ID system. For details, see section 5.4.1.

4.3 Modern State Surveillance Culture

4.3.1 Anti-terrorism and Crime Prevention in the UK

Modern state surveillance, as it has introduced in Chapter 2, is mainly adopted through digital means such as CCTV cameras, datafication, and biometric identification. Nowadays, it is commonly believed that contemporary capitalist nation-states are "surveillance societies" (Lyon, 1994). Wood and Webster (2009) indicate that state video surveillance in the UK began to prevail in the UK after the late 1980s and tremendously expanded its scale from the mid-1990s to the early 2000s. The situation since the 2000s is seen as the consequence of an urgent agenda for tackling international terrorists, especially after the terrorist attacks in the US on September 11, 2001 (Solove, 2011, p. 1). For the UK, mass surveillance has been intensified after the 7 July 2005 London bombings, leading to a great increase in the installation of CCTV cameras from 4 million in 2005 to 6 million by 2015 (Lawless, 2015).

Internet surveillance and information interception have also been rolled out to tackle terrorism. According to the Equipment Interference Code of Practice (2018), security services are allowed to intercept information in electronic devices and servers under warrants made by appropriate law enforcement officers. Therefore, the UK intelligence agency can launch a "bulk equipment interference" overseas if any suspected terror activities are found outside of the country (Home Office, 2018). Other forms of equipment interference mentioned in the code of practice have involved the characteristics of spying activities. For instance, the legislative act requires service providers to retain web records for no less than 12 months so that security agencies can obtain online activities of suspicious persons to help with the investigation, and "real-time surveillance" can be launched upon target persons under a warrant (Home Office, 2018).

Mass surveillance in the UK used to be promoted through a "tricky" ideological strategy to disguise the concept of privacy concern subtly - A campaign slogan is declared that "If you've got nothing to hide, you've got nothing to fear" (Solove, 2008, p. 748). This argument also appeared in Henry James' *The Reverberator,* as one of the characters thinks, "If these people had done bad things they ought to be ashamed of themselves and he couldn't pity

them, and if they hadn't done them there was no need of making such a rumpus about other people knowing" (Solove, 2008, p. 749).

In short, it can be seen that modern state surveillance in the UK has employed digital technologies that are devoted to sorting out potential terror attacks.

4.3.2 Purpose of Maintaining Social Stability in China

Despite the fact that China is not a main target of international terrorism, this country has still experienced several violent attacks by the Xinjiang Islamic separatists in recent decades – The "ethnic violence" took place in Xinjiang province on 5 July 2009, killing more than 140 death and hundreds injured (Guardian, 2009) A knife attack occurred in Kunming Railway station caused 29 death and 130 injured (Guardian, 2014). These two attacks significantly intensified the CCP's surveillance strength and coverage over the country. The CCP started to design a poly-centric surveillance apparatus that has three functions: guidance, inducement and coercion (Leibold, 2011, p. 4).

State surveillance in China has been developed as sophisticated as the "grid-style social management" has been experimenting since the early 2000s (Leibold, 2020, p. 50). This mode carves up neighbourhoods into geometric grids and requires a host of security officials to maintain stability and harmony (Leibold, 2020, p. 50). Grid management has been applied in pandemic control across the country as well (Tang, 2020, p. 1). It aims to combine smart surveillance technologies with basic security patrol units to build a "multiscalar" social control system (Leibold, 2020, p. 50). In 2015, the CCP called for an urgent scheme for increasing smart CCTV monitoring systems to systematically and densely cover all public areas and emphasised the idea of "bringing high-tech security into the household" (Leibold, 2020, p. 51). Furthermore, the Xinjiang authorities require all residents in the province to install the surveillance app "Cleannet Bodyguard". Installing this app is obligatory for every resident who is under check by local police (Leibold, 2020, p. 52). It is designed to "automatically detect terrorist and illegal religious videos, images, e-books and electronic documents" and alert authorities to delete the contents on time (Leibold, 2020, p. 52).

This surveillance mechanism was later applied to China's Internet censors as well. The government has relied on a toolkit to delete posts, suspend accounts, block keywords, and detain the most outspoken people (Dong, 2022). By 2022, Internet censorship in China expanded rapidly, and the users' locations were revealed as IP addresses on social media posts in order to "unearth overseas disinformation campaigns intended to destabilise China"

(Dong, 2022). Today, other forms of mass surveillance in China have all been equipped with biometric identification and big data technology. E.g., fining jaywalkers and displaying their partially-blurred faces on digital screens at crosswalks, recording facial contours for using financial systems, passing through ticket checking machines by scanning faces at railway stations, etc (Mozur, 2018; Liu, 2020; Gov.cn, 2017).

As introduced in Chapter 2, here we conclude that maintaining social stability and harmony is the main purpose of implementing such technologies. In recent years, China's data-fusion programme has embarked on merging disparate datasets into a centralised database which also contains video surveillance footage, social media accounts, e-commercial data, medical history, hotel records etc. (Peterson, 2021). The main purpose of establishing such a surveillance regime for the CCP is ultimately aiming to achieve the goal of "stability maintenance" that targets domestic citizens who intend to pose any threat to the regime (Peterson, 2021).

4.3.3 Different Social and Political Values

The differences in surveillance scale and form in each country have a strong relation with social and political values under cultural influence. These factors caused governments and institutions to implement digital surveillance differently in accordance with each specific social and political culture. There are two main factors in the UK context that may be associated with the implementation of mass surveillance: 1) avoiding Orwellian-style mass surveillance and 2) privacy concerns. The two causes of intensive state surveillance in the Chinese context are: 1) thinking "privacy" can be sacrificed in exchange for security, and 2) collectivistic values.

For the UK, one of the most concerning issues is the breeding of an Orwellian state, which is covered by intensive mass surveillance. The worries about living in a dystopian society under the gaze of "Big Brother" portrayed by George Orwell in his novel, *1984,* have become a fear in this country's political culture. In the novel, citizens of Oceania are oppressed, brainwashed, and ignorant under the control of "Big Brother" (Orwell, 1948). *1984* was written 2-3 years after the end of World War II (Baldwin, 2022). The outcomes of this novel critique the future of democracy, as Orwell was considering that the growth of government power and technological development may lead to an unceasing expansion of social control (Baldwin, 2022). Silkie Carlo, Campaign organisation Big Brother Watch declares that "we work to roll back the surveillance state and protect the rights of everyone in the UK to be free

from unfair intrusion" (Big Brother Watch, 2022). Its primary goal is to fight against facial recognition cameras across the country and protect free speech online (Big Brother Watch, 2022).

Private life is one of the basic human rights in the UK, which is protected by the Human Rights Act 1998 (legislation.gov.uk, 1998). Article 8 states that the range of private life includes one's sexuality, body, personal identity and how one looks and dresses, forming and maintaining relationships with other people, and how one's personal information is held and protected (Citizen advice, n.d.). However, research conducted by Fleming et al. (2021) on participants in the UK shows there has been no clear association between private behaviour and personal data. As mentioned in section 4.3.1, the UK government has installed millions of CCTV cameras across the country. Furthermore, a UK study found that 63% of participants polled supported the expansion of surveillance, with 27% of them saying their opinion had "changed due to recent terror activities" (Computer Business Review, 2016). This contradiction would be considered as what made the UK a "most surveilled" country.

A 2021 Chinese study reveals that over two-thirds of participants in China agreed that the government has the right to monitor public spaces, while the older participants think the government has the absolute right to do so (Xie, 2021). It indicates that most Chinese citizens regard maintaining security as being prioritised over ensuring privacy (Xie, 2021). The elders are more likely to agree that they have nothing to worry about being monitored if they have done nothing wrong, even though being monitored can make them feel safe as all criminal behaviours in public spaces were recorded (Xie, 2021). Yanhong Li, the Chief Executive Officer of the Chinese multinational Internet and AI company Baidu said "people in China hold a more open attitude to private issues, they do not feel sensitive at all, and they are willing to pay for their privacy for buying efficiency, security and convenience" (China Daily, 2018).

Taking social control and mass surveillance during the COVID-19 crisis as an example, Liu and Zhao's (2021) study found that "terms addressing collectivism and communitarianism occupied more prominent positions than personal privacy concerns". This emphasises the public support for achieving collective interest through sacrificing individual interest and insisting on an obligation to embrace technological means that help to stop the virus transmission as "a valuable public good" (Rolland, 2020, p. 28; Liu and Zhao, 2021). Meanwhile, on Chinese social media platforms, some comments posted by Chinese users

gained the highest number of "like" appeared to express a superior sense when they compared collectivism with Western individualism. For example, one of the comments argues that:

'China's collectivistic values are scientific. Individuals are products of society, so an actual individual world has never existed. Individual behaviours can influence others. So taking care of each other can ensure everyone's security and freedom. There is no absolute freedom in the world. These are all empty imaginations. You know the consequence of insisting on freedom in the US during the pandemic' (Lin, 2022)

Conclusion

This chapter identified how historical events have developed the political and surveillance cultures of China and the UK to influence their practical forms of state surveillance and concepts of privacy.

In the UK, a combination of historical conditions, including social structures, economic transformations, and revolutionary events, formed its unique political culture. This cultural foundation created the values of protecting individual rights and privacy. The bourgeois revolutions, which dismantled feudal structures, paved the way for capitalism and the enhancement of individual freedoms. Consequently, the UK's legal framework is fundamentally proposed to ensure privacy and support individual liberty.

The political culture in China originated from collectivist traditions and Confucian values. Its interest in social harmony is prioritised rather than ensuring individual privacy. Historically, privacy concerns were minimised in China due to its collectivist environment and negative understanding. Thus, personal privacy was not a significant focus until recent decades.

This chapter also discussed several ways in which these historical influences manifest themselves in modern surveillance practices. It found that both countries are making efforts to maintain social security and stability by heavily relying on surveillance technologies, yet the practical forms differ in their own cultural and ideological frameworks.

Chapter 5 - Methodology

Chapter Overview

This chapter outlines a combination of research methods for investigating the promotion of mass surveillance tools employed by institutions and corporations in China and the UK during the COVID-19 crisis. The methodology focuses on uncovering the ideological strategies rooted in the specific cultural and political factors of each national context that shape communication practices. The research design establishes a comparative framework of key events relevant to biosecuritised pandemic control in both countries and examines how institutions and corporations promote digital surveillance tools in line with their respective cultural and political contexts.

Section 5.1 (Research Design) introduces the central problem and research question, explaining how the subsidiary questions support this investigation. This section also justifies the comparison of China and the UK as representative origins of two distinct cultural-political models: individualism versus collectivism, and modern democracy versus authoritarianism.

Section 5.2 presents the theoretical foundation of Discourse Analysis (DA) and explains the selection of Critical Discourse Analysis (CDA) as the primary research method. It also discusses two additional approaches employed to strengthen CDA: the Discourse-Historical Approach (DHA) and the Pragmatic-Dialectical Approach (PDA).

Section 5.3 sets out the criteria for data collection, identifies potential challenges and solutions, and provides an indicative list of samples.

Section 5.4 illustrates the discourse analysis process through a flow chart, explaining the principles of the combined methods used to address the research problem.

5.1 Research Design

5.1.1 The Problem and Research Questions Design

The central question of this thesis is: *How have digital and biometric surveillance tools been promoted and justified during the COVID-19 crisis?*

The fundamental question is asking how it was that the implementation of mass surveillance tools differed between China and the UK in terms of how cultural and political factors

factored into its deployment and what made it so. The focus of the theoretical framework in response to this question includes the following three key dimensions that shape how governments design and promote contact-tracing applications: 1. Different surveillance cultures in each country can result in different forms of digital solutions to control the pandemic. 2. Language use is a key component in triggering the cultural perception of surveillance for public acceptance. 3. Technology's role in governmentality, biopolitics, and achieving a society of control.

Subsidiary questions that need to be addressed in the thesis are:

i)   How are political and social values utilised in communication when promoting digital and biometric surveillance products?

ii)   How cultural paradigms shape digital surveillance varies across different cultures and histories, influencing both its acceptance and implementation?

iii)   How a society of control is formed under different cultural, societal, and political contexts?

To tackle the first subsidiary inquiry, the analysis focused on the discursive practices through which biosecuritised mass surveillance tools are promoted and justified, examining how political ideologies and cultural values shape the communication practices regarding these technologies. For example, in China, the focus on collective efforts, different understandings towards privacy, and the general acceptance by the public on surveillance may lead to easier promotion of the HCS. In contrast, in the UK, individual liberties and privacy concerns can foster a more judicious and regulated approach to NCA advocacy.

The second subsidiary question, in response to the first subsidiary question, explores the reasons as to why people think differently about mass surveillance in the promotion. The underlying premise is that a country's surveillance culture is forged through longstanding hierarchies and historical regimes of social control. As such, what Chinese and British citizens accept regarding surveillance products may vary for cultural and historical reasons. In China, the normalisation of everyday surveillance practices in order to preserve a "harmonious society," as well as long-standing population management mechanisms such as the hukou system, may reduce public resistance to the implementation of the HCS (Huminsk, 2021; Chan & Zhang, 1996). Capitalisation fosters democratic values and privacy

consciousness in the UK, whereas a series of political reformative events may render mass surveillance tools difficult to implement effectively.

For the third subsidiary question, the analysis focused on the role of digital and biometric tools of surveillance in the establishment of a society of control in specific political and cultural environments. More than just being temporary public health interventions, they constitute the mechanism through which institutions establish continuous surveillance with conditional social access. In China, the integration of the HCS into daily governance structures may reinforce a mode of infrastructural control in regular mobility and service access. In the UK, where the democratic safeguards and discussions of privacy restrict direct implementation, the gradual normalisation of the use of application-based monitoring and data-driven risk management may extend mechanisms of control, however, in a mediated legal and negotiated manner. In short, the subsidiary questions could fairly reveal cultural-political factors behind surveillance cultures so that a sufficient empirical foundation can be provided for answering the central question.

5.1.2 The UK: The Origin of Modern Democracy and Individualism

This study contrasts China and the UK, two nations of very different cultural and political contexts. The UK indeed played a pivotal role in the Western world's modernisation, being the first country to industrialise and the first capitalist nation (MacFarlane, 1978, p. 255). It is also the source of the Anglosphere, which shares cultural values, liberal market economics, and democracy with countries including Canada, Australia, and New Zealand and possible member countries like India, Singapore, and Hong Kong (Rutland, 2014, p. 38; Kenny and Pearce, 2018). Through colonial expansion, its presence increased as cultural imperialism was systematically imposed. The imperialists of Great Britain also influenced the political and economic systems, transforming "the set of ideas, beliefs, rules, and conventions concerning social behaviour" in their colonised countries, to both cement the imperial system and a culture of distinction (Stoddart, 1988, p. 650). Furthermore, the UK serves as the cradle of modern democracy: representative democracy first appeared in 13th-century England, during a struggle between King John and the nobility that limited monarchical authority for the first time (Carpenter, 2018, pp. 17-18). The UK is hence described here as a characteristic case of the modern Western democracy structure.

The UK is a particularly interesting case, as its surveillance culture can date back to the early eighteenth century. In the UK, for example, the modern civil registration system was first

introduced in 1837 (Higgs, 2004, p. 18). This country, paradoxically, is considered a paradigmatic Western democracy and yet is one of the most surveilled (this has been explained in the previous chapters). Here, I summarise some of the reasons: 1) Parliament passed the Communications Data Bill (or the snoopers' charter), in 2016, which means Internet users' online activities may be intercepted (Ashford, 2016). 2) In 2019, the number of CCTV cameras for every 1,000 people in London has reached 68.40, which has surpassed that of Beijing (39.93) facial recognition cameras are starting to be deployed in London and airports (Bischoff, 2019; Murgia, 2019; Bernal, 2019). Live facial recognition began being run in central London in early 2020 (Tidman, 2020). AI-based facial recognition cameras have been deployed to monitor social distancing in London and other municipalities in conjunction with COVID lockdowns (Roach, 2020). More recently, 10 mobile, live facial recognition vans were deployed across England and Wales and targeted high-harm offenders by 13 August 2025 (Home Office, 2025). The system made 580 arrests over the last year, including 52 sex offenders, as proof that the system was working. And these measures show how, despite it being a democracy, the UK has normalised levels of surveillance on par with but at times higher than those of authoritarian states.

The examination of the UK's political history and surveillance culture is crucial for understanding how digital and biometric surveillance tools have been promoted and justified during the COVID-19 crisis. The country's experience can explain how a democratic country with a strong emphasis on individual rights and freedoms can influence surveillance measures, specifically in response to public health emergencies.

5.1.3 Why Comparing China: The Origin of Confucian Ethics and Asian Collectivism

Unlike Western countries and some other East Asian countries, such as Japan and South Korea, which have experienced successful democratic reforms and adopted a Westernised democratic system in the last century, China has failed in several historical attempts at democratic reform. The CCP inherited the People's Commissariat structure from the USSR (Yuan, 2011, p. 143). Its authoritarian mode encouraged the wide use of advanced surveillance products, including under-mask facial recognition, gait recognition, and a fully digitalised and data-driven social credit score system across the country, which shares the same database with the HCS (Drinhausen, 2021). When considering why China has become a surveillance state, its political model alone does not fully explain the prevalence of citizen control. The nation's distinctive history of social control and political philosophy is as crucial to understanding its surveillance culture as the historical context shaping surveillance in the

UK. For instance, traditional Chinese philosophy like Confucianism (also known as Ruism) advocates that people should be loyal to the country and their parents, and government officers were regarded as 父母官 (governors as parents) in ancient China (Yuan, 2023, p. 23).

For these reasons, China and the UK have been chosen as two typical countries with their unique cultural and political backgrounds. Comparing the use of digital surveillance products in these two systems, this research shows that ideological factors have influenced both discursive practice and the practice of surveillance.

5.2 Research Method

5.2.1 Selecting CDA as the Methodology

Critical Discourse Analysis (CDA) was adopted as the research method for examining discursive practices in communication, as it reveals how symbolic meanings differ across cultural and cognitive patterns (Xu, 2005, p. 43). Focusing on linguistic nuance, this approach reveals the socio-cultural and cognitive undertones in discourse. It provides a means to explore the inferences and ideologies sustaining communication in different locations. CDA is one of the sub-disciplinary strategies of discourse analysis (DA) and was developed primarily by Fairclough (1995) and van Dijk (1997) and it is applied to discerning linguistic, power, and ideological discursive features. It was developed to investigate "lexico-grammatical meaning in written and mass-mediated texts" (Blommaert et al, 2001, p. 5). This method is employed in exploring "what and how language communicates when employed deliberately in certain circumstances and contexts" (Cameron, 2001, p. 13).

In the 1990s, the pioneers of CDA further developed a set of research traditions, mainly including three schools of approaches. 1) Fairclough's neo-Marxist and post-Foucauldian "pragma-dialectic" approach. 2) Wodak's Discourse-historical Approach (DHA), which is rooted in the Critical Theory of the Frankfurt School and text-linguistics. 3) van Dijk's interdisciplinary socio-cognitive mode which brings linguistics, cognitive psychology and communications studies together.

Wodak and Meyer (2002, p. 10) state that CDA views language as a key aspect of human activity, mutually shaping society over time. Language choices, including grammar and lexicon, reflect the speaker's ideological patterns (van Dijk, 1997, p. 25). Thus, language is an ideological social practice. Understanding language practice is crucial for analysing how elites use discourse to establish and maintain social relations (Gramsci, 1995, p. 378). In

other words, language is a social practice driven by ideologies. Studying language practice is essential for understanding how elites establish and maintain social relations through discursive practice (Gramsci, 1995, p. 378). CDA, as a critical theory, it in practice aims to address power abuse, such as racism or sexism in discursive production (van Dijk, 2005, p. 349-371; Wodak and Resigl, 2005, p. 372-397).

Wodak and Meyer (2001) point out that this method focuses on interdisciplinary research in order to figure out how language works in the process of knowledge exchange, in establishing social institutions, and in power implementation across social contexts. Political discourse is a type of social interaction with the purpose of exercising power, and persuasion is a key element in political communication that changes the beliefs and attitudes of the public (Fairclough, 1995, p. 6; Westwood, 2015, p. 511). CDA reveals how ideologies and values manifest and are used in political communication, effectively detecting societal issues such as privacy concerns in biometric surveillance for disease control.

Hajer (1995, p. 44) defines discourse as a collection of ideas, concepts, and categories that are developed, maintained, and altered through distinct practices, influencing the interpretation of physical and social realities. Fairclough (1995, p. 6) states that texts ideationally function as systems of knowledge and belief. This definition can be seen as an extension of Habermas' theory of communication, which Wodak (2001) summarises: "language is also a medium of domination and social force. It serves to legitimise relations of organised power." Social practice, according to Schmidt (2008, p. 311), is the process of communication that coordinates norms and values across the public sphere.

The reason for adopting CDA is that this method is designed to investigate relationships in discourse, structure, and the influential role that language plays in the legitimisation of power relations. Unlike DA, CDA does not merely focus on text and neglects how semantic meaning is affected by social structures (Fairclough et al., 2002, p. 4). As a critical interpretative method, CDA does not rely on positivist theories on the basis of scientific laws or any empirical generalisations (Howarth et al, 2000, p. 7). Wodak (2001, p .9) points out that its critical paradigm focuses on exposing social forces that consist of a discursive regime. To be specific, it uses the empirical investigation of linguistic practice to reveal the exercise of power and the relations among different social groups (Howarth et al, 2000, p. 3). By using the CDA, the social practice reflected in power relationships and ideologies behind

discourses can be identified through studying the discursive strategy of the speaker, because discourse is a kind of social practice of representing the world' (Fairclough, 1992).

In short, CDA is chosen as the research methodology to analyse how language reflects power dynamics and ideologies in communication. It is used to examine the relationship between language, society, and power, focusing on how language communicates within specific contexts. Unlike traditional discourse analysis, CDA can go beyond text to reveal how discourse legitimises power and addresses societal issues.

5.2.2 Discourse-Historical Approach

To address the central research question of examining differences in biosecuritisation and the potential abuse of power in promoting mass surveillance tools, the Discourse-Historical Approach (DHA) was applied to enhance CDA, enabling analysis of how historical legacies in each country's surveillance culture have manifested in the modern social context. Understanding the DHA requires clarifying three key concepts common to all variants of CDA: critique, power, and ideology (Reisigl and Wodak, 2008, p. 87).

The concept "critique" in a DHA situation follows a critical theory in the socio-philosophical orientation. It consists of three aspects: 1) Text or discourse-immanent critique, 2) socio-diagnostic critique, and 3) prospective critique (Reisigl and Wodak, 2008, p. 88). According to Reisigl and Wodak (2008), text or discourse-immanent critique is used explicitly in "discovering inconsistencies, self-contradictions, paradoxes and dilemmas in the text-internal or discourse-internal structures". Socio-diagnostic critique enables the researcher to discover the "manifest or latent' persuasive or "manipulative" character of discursive practices. The interdisciplinary character of the DHA shares the contextual knowledge in a particular research topic and other theoretical models from various disciplines in interpreting discursive events (Reisigl and Wodak, 2005). Prospective critique aims to enhance the "Improvement of communication", for example, by reducing terms directly related to surveillance behaviours in promoting and explaining relevant products. By obeying these theoretical principles of the DHA, the analyst is therefore enabled to justify why certain interpretations and readings of discursive events are considered more valid than other types of CDA (Reisigl and Wodak, 2005).

5.2.2.1 Ideology in DHA

From Reisigl and Wodak's (2005) perspective, ideology in the DHA can be seen as an (often) one-sided perspective or worldview containing "related mental representations, convictions,

opinions, attitudes and evaluations, which is shared by members of a specific social group". Ideology in discursive events reflects unequal power relations and power abuse, for example, by controlling the access to specific discourses or public spheres or by justifying an unacceptable concept in normal circumstances through using disguised replacement of concept (e.g. making a public health crisis a security issue). Exploring ideologies in this research is an indispensable step for finding out the root of differences between political and business communication. The DHA can help me investigate the ways in which linguistic and other semiotic practices mediate and reproduce ideology in a variety of social institutions.

The concept of power relates to an unequal relationship among social actors. Weber (1978, p. 28) regards power as the possibility of being against the will or interests of one social position or social group by the other one's will within a social relationship. Power can be performed as "actional power" such as physical force and violence; the control means threatening or forcing people to be submissive to authorities, and technical control through objects. For example, means of weapons, transportation, and production .etc (Popitz, 2017). In real practice of the DHA, the analyst should focus on the linguistic ways used in various expressions and manipulations of power. Reisigl and Wadak (2005) indicate that power is discursively exerted by both grammatical forms and the control of social occasions by means of a text genre or by the regulation of access to certain public spheres. Lukes' three dimensions of power can specifically define power relations in discursive practice: 1) decision-making power, which indicates that power is exercised through absolute decisions and overt actions in a pluralist system (Lukes, 1974, p. 57). 2) Non-decision-making power, which focuses on agenda-setting in debates to avoid the emergence of values and interests against the decision-maker (Lukes, 1974, p. 17). 3) Ideological power, which allows one to shape or determine people's beliefs, values and opinions (Lukes, 2005, p. 22). Examining power relationships in the discursive practice of communicative events enables me to locate any power abuse in biosecuritising the COVID-19 crisis in order to discuss how the implementations of mass surveillance techniques are influenced by ideological means.

The DHA is employed to investigate various perspectives of phenomena in our societies. The research has to be interdisciplinary, and the study of language is merely a part of the whole perspective, including the history, background, economy, etc. Thus, some types of external sources (e.g. time, funding, etc.) also need to be referenced to explain the complexity of a research object (Reisigl and Wodak, 2005). By following the *principle of triangulation,* the

analytic process can be enriched with a wide range of background information, empirical observations, theories and methods (Reisigl and Wodak, 2005).

Wodak (2015, p. 2) summarised 10 of the most important principles of the DHA:

1) The approach is interdisciplinary. Interdisciplinarity involves theory, methods, methodology, research practice, and practical application.

2) The approach is problem-oriented.

3) Various theories and methods are combined wherever integration leads to an adequate understanding and explanation of the research object.

4) The research incorporates fieldwork and ethnography (study from "inside") where this is required for a thorough analysis and theorising of the object under investigation.

5) The research necessarily moves recursively between theory and empirical data.

6) Numerous genres and public spaces as well as intertextual and interdiscursive relationships are studied.

7) The historical context is taken into account in interpreting texts and discourses. The historical orientation permits the reconstruction of how recontextualisation functions as an important process linking texts and discourses intertextually and interdiscursively over time.

8) Categories and tools are not fixed once and for all. They must be elaborated for each analysis according to the specific problem under investigation.

9) "Grand theories" often serve as a foundation. In the specific analyses, however,"middle-range theories" frequently supply a better theoretical basis.

10) The application of results is an important target. Results should be made available to and applied by experts and should be communicated to the public.

5.2.2.2 How I Use Them in the Analysis

This study will draw on the DHA as an interdisciplinary-historical perspective to further develop CDA in considering the promotional strategies of China and the UK during the pandemic. To grapple with these strategies, one cannot ignore a combination of historical, political science, sociological and communications orientations. These insights allow us to determine what influences governmental communication in convincing the public to use digital and biometric surveillance. This thesis focuses, thus, on how the surveillance tools and related biosecuritised practices were marketed and announced, exploring official communications in the context of privacy, civil liberties, and public health needs.

My analysis involves a recursive process that moves back and forth between theoretical frameworks and empirical data. This can ensure that the findings are grounded in real-world observations and that theories are refined based on empirical evidence. Understanding the historical context is crucial for interpreting how past events and discourses have shaped current strategies. For example, China and the UK have different histories of surveillance and public trust in government, leading to disparate ways to promote and understand digital surveillance tools. Historical analysis can reveal how past narratives have been recontextualised to support contemporary policies.

5.2.3 Drawbacks and Improvements of CDA

However, the validity of CDA as a critical theory cannot be ensured over time in the practice of analysis. Widdowson (1998, p. 137) argues that CDA researchers, in particular the use of van Dijk's cross-disciplinary tradition, are "a kind of ad hoc bricolage which takes from theory whatever concept comes usefully to hand". The theoretical foundation of CDA is based on Halliday's Systemic Functional Linguistics (SFL) (Harrison and Young, 2004; O'Grady, 2019). In other words, it has been generally acknowledged that SFL can be incorporated into a CDA framework as "a tool to explicate the representation of bias in media discourse" (O'Grady, 2019, p. 463).

Nevertheless, the defect of this mode cannot be neglected. As O'Grady (2019, p. 463) points out, "it neither gave an account of the context in which the media texts were produced nor was it able to account for the effect of language upon society". Widdowson (1995) criticises the bias that occurred in CDA because it conflates semantics and pragmatics and fails to accommodate a variety of reading positions. The meanings of texts are assumed to represent the ordinary readers' positions and attitudes, which can lead to biases (O'Grady, 2019. P.

463). He indicates that the data chosen by CDA analysts would be biased and affected by their preconceived ideas.

Widdowson (1998, p. 150) finds the validity of arguments in some CDA studies appeals to "moral conscience" and "social justice" rather than respecting reliable empirical evidence. van Dijk (2008, p. 38) also criticised the SFL view of context. He argues that it is based on a limited social theory language merely focuses on a linguistic perspective and is not cognitive enough (van Dijk, 2008, p. 38). Furthermore, Maussen (2006, p. 102) criticised CDA as he found researchers often tend to analyse the texts within their hypotheses developed in theoretical frameworks.

In real practice, the analytical process and results of CDA would not only be influenced by the practitioner's own position and preconceived assumptions, but the lack of an argumentative theory is also a significant drawback. The practitioner, in general, may merely focus on the rhetoric and narrative of discourses rather than giving a specific argumentation in order to make a rational convincement.

5.2.3.1 DHA as a Remedy

The triangulation principle of the DHA, which requires practitioners to work based on a variety of different data, methods, theories, and background information, can enhance the quality of CDA with empirical evidence (Wodak, 2015, p. 2). Scholars found that CDA can also be combined with argumentative analytic approaches to amend its drawbacks (Wodak, 2007; Ihnen and Richardson, 2011). For this reason, I chose the DHA, which has a strong and organised focus on argumentation, to improve the overall depth and validity of my CDA from multifaceted sources behind a discursive event. Reisigl (2014, p. 69) points out that, "the DHA is the only school of CDA that includes argumentation and multi-perspectivity as formal constitutive elements in the theoretical conception of discourse".

In the DHA, macro-topic relatedness, pluri-perspectivity, and argumentativity are regarded as essential elements of discourse (Reisigl, 2014, p. 69). Discourse is understood as "a complex of context-dependent semiotic practices situated within specific fields of social action," practices that are "socially constituted as well as socially constitutive" (Reisigl, 2014, p. 69). It is intrinsically linked to a macro-topic and to argumentation over validity claims, while engaging social actors with differing perspectives (Reisigl and Wodak, 2009, p. 89).

5.2.4 Pragmatic-Dialectic Approach Before the CDA

To further improve the depth of my research, a framework of the Pragmatic-Dialectic Approach (PDA) combined with CDA is used. The Pragmatic-Dialectical Approach (PDA) can play a significant role in traditional CDA (Breeze, 2011; Richardson, 2017). It aims to remedy potential drawbacks of CDA, which might be caused by the analyser's personal position that the principle of CDA would be more or less ignored. CDA is designed to analyse all variants of texts, such as speech, conversation, news coverage, or statements. Its theoretical and analytic principle focuses on finding the relationships between text and context. Yet, PDA is more focused on investigating speech acts according to socio-cultural contexts (Al-Hindawi and Saffah, 2017, p. 94). To be exact, pragmatics is interested in exploring the relations between signs and their users (Al-Hindawi, 2017, p. 94).

The pragma-dialectical theory (also known as Pragma-dialectics) was developed by Van Eemeren and Grootendorst in the 1970s. Their theory aims to resolve differences of opinion through a critical discussion which tests the acceptability of the disputed positions (Grootendorst and Eemeren, 2004, p. 9). The term Pragma-dialectics is constituted of two terms, "Pragmatics" and "Dialectics", to indicate its pragmatist character with a dialectical theory. This method examines both explicit and implicit argumentative practices in real social activities, viewing argumentation as a complex speech act embedded in natural linguistic practice (van Eemeren and Grootendorst, 2004, p. 9). The function of argumentative discourse within this framework is "evaluated from the point of view of the ideal model of a critical discussion that specifies the stages and rules instrumental to the rational resolution of a difference of opinion" (Ihnen, 2011).

Clear differences exist between pragma-dialectics and CDA, as argumentation is not a primary focus of CDA. A CDA perspective does not require any specific type of discourse or any element of a discourse. It can be applied in many situations, such as argumentative, informative, or explanatory (Ihnen, 2011). Yet, pragma-dialectics is exclusively used to deal with argumentative discourse, and it has its own method of analysis that carries out a "normative reconstruction" of discourse (Ihnen, 2011; van Eemeren et al., 1993). According to van Eemeren (1993), reconstruction involves identifying and organising a series of argumentatively significant actions from a series of pragmatically structured speech acts. This process links these actions with the standards and categories of an ideal model for critical discussion, presenting them in an analytical overview. Additionally, types of discourse relevant to CDA may not be applicable from a pragma-dialectical perspective. A typical

description of texts in CDA is based on the opinion of a specific social problem, such as the employment of facial recognition cameras for maintaining social distancing as a deprivation of privacy, and focuses on the discursive manifestation of power abuse (e.g. the overwhelming number of media articles supporting the HCS in China whereas critiques are sunken in the "spiral of silence"). The sample of discourses, in a pragmatic manner, should focus on contradiction and persuasion rather than a normal statement (see section 4.3.4).

In brief, combining PDA with DHA can strengthen the CDA process by revealing complex cultural and ideological factors in communication and providing a comprehensive basis for analysing how ideological strategies promote surveillance products. This integration addresses criticisms of CDA by incorporating interdisciplinary perspectives, historical context, and diverse data sources (DHA), as well as a structured framework for analysing argumentative discourse (PDA).

5.3 Data Analysis and Corpus

5.3.1 Selection of Data

The reason for conducting this research is to investigate the role cultural and political ideologies play in supporting advanced mass surveillance in different social and political contexts. This research analysed data gathered from two sources: 1) Official websites (Gov.uk and Gov.cn), 2) Chinese state-controlled media outlets. It aims to examine how cultural and ideological dimensions inform the use of political and social values in communication to both enable and challenge surveillance in the context of the COVID-19 crisis.

The analysis intends to highlight how these documents mobilise political and cultural values to legitimise intrusive data collection. It details, in particular, the extent to which the statements biosecuritise the epidemic (through fear-driven strategies), framing COVID-19 as a security threat rather than a public health crisis, and promoting medical apps designed to track and control individual movements.5.3.2 Potential Challenges

Two key challenges emerged in selecting subjects in Sampling This study. The first challenge was asymmetry of information transparency and source accessibility between the two national contexts.

In the UK, government communications are published on official websites. Original documents, official statements, and press releases can therefore be accessed directly.

However, the same genre of information in China is being passed on via state-controlled media outlets such as Xinhua or People's Daily. These outlets often embed government rhetoric with news commentary in the form of official publications, so it is difficult to identify only administrative discourses in pure form. Most important of all, when sampling official materials, unmodified content such as press releases and policy introductions republished from news organisations should be kept, so that Chinese authorities can retain their own original discourses. For instance, [G1-CN-Text 1] and [G1-CN-Text 2] are original transcripts of Xi Jinping's speeches, which are symmetric to Boris Johnson's quotes on coronavirus ([G1-UK-Text 1] and [G1-UK-Text 2]) published at gov.uk.

Bearing this criterion in mind, all samples related to China's HCS in the corpus table (see section 5.3.6) are then sourced from official media outlets rather than the official publications of the government (Gov.uk and NHS, for instance). Those three, [G1-CN-Text 1], [G1-CN-Text 2] and [G1-CN-Text 10], are republished material sourced from Xinhua News Agency (gov.cn). This media outlet is the official state-owned news agency of Communist China, and the centre of CCP's coverage, which is based in the CCP's Central Propaganda Department (CPD) as its main source of domestically- and internationally-published news coverage (Ma, 2020).

Other media outlets, such as *Beijing Youth Daily*, are mostly overseen by the CPD, or at least publicly acknowledge their social responsibilities of serving as the central government's propaganda institution (Beijing Daily, 2022; Beijing Daily, 2023). For instance, as noted in the *Beijing Daily Newspaper Group Social Responsibility Report (2022 Edition)*, the group "adheres to Xi Jinping Thought on Socialism with Chinese Characteristics for a New Era, fully implements Party directives, and prioritises the consolidation of mainstream public opinion" (Beijing Daily, 2023). *Guangming Daily* stated that it "actively promotes the Party's theories, priniciples, and policies, as well as major decisions and deployments of the central government" (Guangming Daily, 2024).

These sources for the Chinese samples are thus confirmed to be official propaganda outlets, and their use reflects China's centralised model of information dissemination. Under the supervision of the CPD, the media outlets have their responsibility to amplify Party narratives and ensure ideological alignment, as the department's duty is to set the agenda and deciding the official message, making sure that all media outlets cover major news events at the same time and use the same wording (Reny, 2008, p. 9-30). Moreover, this model led party-

affiliated media to heavily rely on scripted, centrally directed content rather than independently published material, especially since Xi Jinping became president after 2013 (Waight et al., 2025). The content, therefore, prioritises political legitimacy and social stability that journalism can be merged with state messaging.

In China, the information and representations for news reports of politician speeches, policies of any or politician's, for China's public affairs are basically verbatim content re-hashes rather than their reporting (Stockmann & Gallagher, 2011), by the news media and journalists. This contrasts with the UK's model, where government communications are more frequently published directly from official sources that include the UK government (gov.uk) website and the NHS website. In fact, UK news organisations in their political communication also depend on government and party press releases for information subsidy, but the journalists would have had their own agency to reprocess and critically analyse these press releases in the production of news (Davis, 2002, p. 28).

It may be expected, then, that Chinese news stories mix up with policy messages and propaganda. This mingling is even analytically important and is justified in terms of a depiction of China's relationship with media and politics, yet it nevertheless complicates material categorisation and comparisons. UK materials, in contrast, are inherently more defined institutional genres that afford more precise inquiry into communicative intentions.

The second challenge is that the issue of linguistic nuances in translating original Chinese texts into English is inevitable. Bureaucratic rhetoric and highly "formulated" official languages in the Chinese text caused an extra layer of complexity in translation. The "formula" in this context refers to the specific rhetorical style of official political texts in China. To be more specific, in Chinese stylistics, it is attributed to 政论文体 (Zhenglun wenti), an administrative-political style which is used in Party and government documents. The Zhenglun wenti is a formal genre of writing characterised by ideological persuasion, formulaic expressions, and a highly generalised and abstract style of language (Yang, 2014). For example, in [G1-CN-Text 1], Xi Jinping states that:

"在充分肯定成绩的同时，我们必须清醒看到，当前疫情形势依然严峻复杂，防控正处在最吃劲的关键阶段。这个时候，必须高度警惕麻痹思想、厌战情绪、侥幸心理、松劲心态，否则将带来严重后果，甚至前功尽弃。各级党委和政府要坚定必胜信念，咬紧牙关，继续毫不放松抓紧抓实抓细各项防控工作，不获全胜决不轻言成功。"

This paragraph contains a substantial amount of Zhenglun wenti style rhetoric. The normal translation method, which is based on literal translation, cannot be applied due to the abstract

style of language. Literal translation corresponds to formal equivalence; yet in highly rhetorical or culturally specific texts, dynamic equivalence is essential (Nida, 2001, p. 223 - 230). It allows translating in such a way that the effect on the target audience is equivalent to the effect on the source audience, even if the wording or structure is not.

To address this, the sentence structures were reorganised, and alternative words were used to make a better understanding while keeping the original meanings as much as possible to fit an English reading habit. Through applying dynamic equivalence when translating Zhenglun wenti in practice, the translation process focused more on the rhetorical functions and re-created them in English political language. Clarity is achieved with shorter and direct sentences to replace tediously long and cumulative sentences in the original texts. A string of four-character clichés "麻痹思想、厌战情绪、侥幸心理、松劲心态" (paralysis of thought, war-weariness, fluke mentality, slackening attitude) was replaced with equivalents while taking the overall context into account. The original literal phrase "咬紧牙关" (clench your teeth) was translated as "standing firm" and "persevering" to achieve an equivalent meaning.

The translated version is:

"While recognising our achievements, we must also remain clear-eyed that the pandemic situation is still grave and complex, and that prevention and control are at a critical stage. At this moment, we must guard against complacency, fatigue, wishful thinking, and any tendency to lower our vigilance, as these could undo all our previous efforts. Party committees and governments at all levels must stand firm, persevere, and enforce control measures with rigour and precision. We cannot declare victory until the battle is fully won."

Overall, the sampling and translation of materials revealed key methodological challenges. The asymmetry of media systems complicated the comparability of sources, while the rhetorical density of Chinese bureaucratic texts required dynamic equivalence to convey meaning effectively.

5.3.3 Sample Groups and Reasons for Inclusion

The corpus is organised into five thematic groups to support a comparative analysis of how digital surveillance tools and biosecuritised actions were promoted and legitimised by the governments. Here are the five thematic groups:

Group 1: Statements from state leaders

Statements by the former UK Prime Minister Boris Johnson and the Chinese President Xi Jinping are sampled to examine how national leaders framed the pandemic response and mobilised public support for biosecuritised actions. This group serves the fundamental function of reflecting each country's governance logic and crisis communication style. To be specific, Johnson's address centres on individual responsibility and the protection of public services; Xi's speech emphasises national unity, party leadership, and the superiority of the socialist system.

Group 2: Vaccination certification and COVID passes

Both countries adopted further digital measures for movement control in public areas in the mid-stage of the pandemic. The two chosen materials are used to compare forms of surveillance within distinct cultural and political frameworks. These cases, beyond surface-level similarities, help to expose the alignment of digital certification systems with Foucauldian governmentality, the exercise of biopolitical control, and the expansion of algorithmic social regulation as an instance of a society of control.

Group 3: Explanations of disease surveillance applications

This is the most essential sample group that investigates official discursive practice involved with digital surveillance during the pandemic. The eight included samples covered three key turning points and the introduction of the digital tools: 1) The pilot/initial launch of the NCA/HCS. 2) Official roll-out of the systems. 3) formal public introductions explaining the systems' purposes and features; and 4) updates and iterations of these technologies.

These materials show a clear comparison of political communication styles between China and the UK, while revealing each country's surveillance culture. Public discourse surrounding the NCA was expressed in a liberal-democratic manner, such as emphasising transparency, individual consent, privacy protection, and partnerships with reputable institutions. By contrast, technocratic, developmentalistic, and collectivistic tones that position the HCS as a core instrument of national modernisation were adopted in the Chinese materials.

Group 4: Official commentary on surveillance technologies

The two materials from each country suggest a propagandistic strategy, as they specifically introduce the download numbers and effects of the digital tools. Each material contributes to the construction of a legitimating narrative around state-led pandemic surveillance, as both

reflect distinct national values, such as voluntarism and public trust in the UK, versus collective obedience and technocratic governance in China.

Group 5: Privacy standards and legal considerations

The two materials are crucial for understanding each country's privacy values and legal concerns regarding digital surveillance. The statement written by the Biometrics Commissioner mentions the prioritisation of privacy, time-limited usage, and democratic principles during the planning phase of the NCA. Interestingly, the Chinese material is a rare piece that discusses privacy protection, ethical issues, and calls for ensuring voluntariness.

This group helps to expose and compare similarities and differences in privacy protection. It is also essential to evaluate the practical outcomes of these considerations, such as how the design and implementation of the NCA in the UK reflect its stated requirements on privacy and voluntariness. In contrast, the HCS in China shows a division between official discourse and actual practice, as the system has failed to uphold the expectation of privacy protection and voluntariness.

5.3.4 Criteria for Sample Selection

Each discursive material focuses on topics of promoting, legitimating, and announcing the implementation of disease surveillance tools and biosecuritised actions from February 2020 until April 2022. This timeframe range covers the critical stages of the pandemic governance in both countries, including the initial outbreak, policy experimentation, nationwide rollouts, and later-stage normalisation of technological interventions.

The selection criteria are based on the analytical needs of the PDA, particularly its emphasis on ideological structures and persuasive legitimation strategies. Unlike conventional CDA approaches that generally focus on sentence-level language or discursive framing alone, PDA in this research requires that the materials exhibit an explicit argumentative structure. To achieve this, the texts need to display the four key stages of critical argumentation according to the PDA principles: 1) Confrontation, 2) Opening, 3) Argumentation, and 4) Conclusion (see section 5.4.1). This structure can be identified in all the sampled and transcribed texts, except [G3-CN Text 6], as an official announcement notifying residents in Shanghai about the updated QR code colour classification rules, which directly starts with an argumentation part for explanation.

Further criteria for sampling include the following three requirements:

First, source authenticity and provenance are carefully checked. All materials are drawn from official state platforms (Gov.uk, NHS website, and Chinese state-controlled propaganda machines). This ensures that the discourse represents the voice of the state or its official agents.

Second, genre and communicative purpose are considered. The materials function as instruments of public persuasion and governance that include statements from national leaders, official announcements, and press releases. They serve to inform and urge public acceptance or compliance, justify state action, and establish the legitimacy of digital interventions. Each selected text belongs to an institutionalised genre that often uses administrative language with ideological messaging.

Third, comparative relevance and symmetry are fully taken into account in the sampling process. Each group contains at least one Chinese and one UK sample. These samples are selected to reflect parallel moments in the development and deployment of digital surveillance tools and biosecuritised actions, such as the national leader's statements, the rollout of digital tools, public justification, and technical updates. The functionally symmetric features allow for structured comparison across national contexts.

5.3.5 Comparative Framework and Corpus

The comparative framework consists of three types of discourse events that took place in China and the UK, which are analysed through PDA and CDA to find out the ideological strategy used in each social context for later discussion. The five grouped types of discursive events are 1) national leaders' statements on fighting against the pandemic, 2) Announcements about vaccination certification and COVID passes, 3) Explanations of disease surveillance applications, 4) Official commentary on surveillance technologies, and 5) Privacy standards and legal considerations. The part of PDA aims to investigate how political and social values are utilised in communication when promoting biometric surveillance products and actions. Then, the CDA part addresses the question of how cultural paradigms shape the concept of surveillance in efforts to influence the way digital surveillance techniques are implemented in different cultural and historical backgrounds.

5.3.5.1 Corpus and Key Information

This part shows the corpus and content descriptions of each material. The corpus contains 20 samples in total (10 UK samples and 10 Chinese samples) from February 2020 until 6 June 2022.

Group	Title	Publication date	Source	Content description
Group 1 – Statements from national leaders	[G1-UK-Text 1] *Prime Minister's statement on coronavirus (COVID-19)*	23 March 2020	Gov.uk	Former UK Prime Minister Boris Johnson announced a national scale lockdown, urging the public to "stay home, protect the NHS, and save lives" with four valid reasons to leave home. He mandated the closure of all non-essential businesses and public spaces, granted police enforcement powers, and explained that these actions aim to prevent overwhelming the NHS and save lives.
	[G1-UK-Text 2] *Prime Minister's statement on coronavirus (COVID-19): 16 December 2020*	16 December	Gov.uk	Boris Johnson celebrated the rapid vaccine rollout and asserted that "we are winning and we will win our long struggle against this virus", while warning of rising infections in London and Kent, moving London into Tier 3. He strongly urged personal restraint over Christmas, emphasising that a smaller, shorter Christmas is a safer Christmas and reminding people that any allowances for meetings were maximum limits, not targets. He recommended delaying gatherings with vulnerable relatives until after their vaccination. Despite the cautious tone, he ended with hope, saying that by Easter, things will be better, and that next year's Christmas could return to normal.
	[G1-CN-Text 1] Xi Jinping: Address at the Meeting on Coordinating the Prevention and Control of COVID-19 and Economic and Social Development	23 February 2020	Gov.cn, sourced from Xinhua News Agency	Xi Jinping commented the Party's unified leadership in confronting COVID-19. He praised medical workers, the army, and the people of Wuhan and Hubei for their sacrifice, framing the fight as a "people's war" under centralised command. He listed strict lockdowns, community grid management, and nationwide mobilisation as proof of China's capacity to control the epidemic. Xi also called for scientific innovation, big data support, economic recovery measures, and international cooperation. The pandemic response was framed as both a severe test and a demonstration of the strengths of Party leadership and the socialist system.
	[G1-CN-Text 2] *Xi Jinping: Speech at the National Commendation Conference for the Fight Against COVID-19*	8 September 2020	Gov.cn, sourced from Xinhua News Agency	Chinese President Xi Jinping celebrates the nation's success in fighting COVID-19. He gives positive comments on frontline workers and citizens, highly praises the unity, sacrifice, and the Party leadership. He also calls for institutional improvement and international cooperation. China's response to the pandemic is framed as a testament of a socialist merit.
Group 2 - Vaccination certification and COVID passes	[G2-UK-Text 3] *NHS COVID Pass*	7 May 2021	NHS	The article introduces NHS COVID Pass. The system displays user's vaccination details, recent test results, or proof of recovery, and can be obtained via the NHS App, NHS website, or by requesting a paper letter through 119. The NHS COVID Pass is valid for travel and certain domestic venues, available to individuals aged 16+ for travel and 18+ for domestic use.

	[G2-CN-Text 3] _Travel: Yellow or Red Health Code Holders Not Allowed to Enter Train Stations_	6 August 2021	People.cn, sourced from Beijing Youth Daily	This official report shows that Beijing railway stations have implemented health code checks for all passengers entering stations or arriving in the city, allowing only those with a green code to travel. Staff conduct manual verification, set up holding areas for at-risk individuals, and enforce mask-wearing and distancing to strengthen COVID-19 prevention.
Group 3 - Explanations of disease surveillance applications	[G3-UK-Text 4] _Coronavirus test, track and trace plan launched on Isle of Wight_	4 May 2020	NHS	The Isle of Wight became the pilot site for England's "Test, Track and Trace" initiative, testing the contact-tracing app to NHS and council staff on 5 May 2020, followed by island-wide access from 7 May. Developed by NHSX with National Cyber Security Centre oversight, the app uses Bluetooth to log close contacts and anonymously alert users if exposed, complemented by traditional phone and web-based contact tracing and testing services
	[G3-CN-Text 4] _Health Codes: A Fast Track to Resuming Work and Economic Activity_	22 March 2020	Xinhua, sourced from Guangming Daily	This article details China's efforts to support post-COVID work resumption by enabling large-scale return-to-work travel using the health code system, including interprovincial recognition of codes. It highlights how provinces like Zhejiang, Shandong, and Guangdong adopted "point-to-point" travel and mutual health code recognition to streamline mobility, while the central government introduced three technical paths for cross-regional code interoperability. The report also addresses privacy concerns and calls for strengthened personal data protection.
	[G3-UK-Text 5] _NHS COVID-19 app launches in England and Wales_	24 September 2020	Gov.uk	The NHS COVID-19 app was launched nationwide across England and Wales on 24 September 2020, following successful trials in the Isle of Wight, Newham, and among NHS volunteer responders. It enables users to receive alerts if they have been near someone with COVID-19 and supports venue QR code check-in, symptom checking, test booking, and self-isolation guidance. Developed collaboratively by NHS Test and Trace, NHSX, Google, Apple, the Alan Turing Institute, Oxford University, and privacy groups, the app is designed for privacy and simplicity, with support from major mobile providers to zero-rate its data usage.
	[G3-CN-Text 5] _Zhejiang Rolls Out Health Code System Today_	12 February 2020	Qianjiang Videos	This video reports on the early rollout of the Health Code system in Zhejiang province, introducing its function as a digital pass for daily life and work. Officials announced plans for province-wide implementation, backed by a unified data framework and forthcoming regulations to support information sharing and management.
	[G3-UK-Text 6] _Introducing the NHS COVID-19 app_	6 June 2022	NHS	This NHS communication details the continued relevance of the COVID-19 app in helping people live safely with the virus. It explains the app's privacy-preserving features, anonymous exposure alerts, and symptom-checking tools, encouraging widespread use to protect vulnerable individuals.

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	[G3-CN-Text 6] *One Person One Code, Big Data Helps Precise Pandemic Prevention*	19 February 2020	Xinhua	This report introduces Zhejiang's full rollout of the HCS which uses big data to support targeted COVID-19 prevention and guide safe work resumption. The system enables dynamic, colour-coded risk management to ensure public health and economic recovery.
	[G3-UK Text 7] *NHS COVID-19 App Updates Across England and Wales*	29 October 2020	Gov.uk	This NHS update announces new features to improve the accuracy and user experience of the COVID-19 app in England and Wales, including better Bluetooth-based distance tracking and removal of false exposure alerts. It emphasises enhanced privacy protections and increased effectiveness in identifying high-risk contacts.
	[G3-CN Text 7] *Shanghai Optimised Code Issuing Rules of 'Suishenma', Issuing Red Codes to Five Types of People, Yellow Codes to Four types of people*	26 April 2022	The Paper (Shanghai United Media Group)	This report explains how Shanghai's "Suishenma" system, as a local versioned HCS, was rapidly developed and expanded to support pandemic prevention, resumption of work, and public services. It details how red and yellow codes were assigned based on risk categories and introduces the system's integration into Shanghai's e-government "One-net-all-solution" platform to enable data sharing, contactless services, and improved citizen access.
Group 4 - Official commentary on surveillance technologies	[G4-UK Text 8] *NHS COVID-19 App Has Been Downloaded Over 10 Million Times*	27 September 2020	NHS	This press release highlights the number of downloads. High engagement and venue usage are also introduced, such as users completed around 1.5 million QR check-ins on 26 September, and over 460,000 businesses downloaded official QR posters to support contact tracing efforts.
	[G4-CN Text 8] *Zhejiang Can Both Ensure Business Reopens and Disease Control with the Help of Big Data*	20 February 2020	People's Daily	This article details how Zhejiang, particularly Hangzhou, used the HCS to both ensure pandemic control and economic recovery. Assigning colour-categorised QR codes through big data analysis enables efficient worker return, community monitoring, and safe reopening of businesses. It offers a model of digital governance during COVID-19.
Group 5 - Privacy standards and legal considerations	[G5-UK Text 9] *Biometrics Commissioner statement on the use of symptom tracking applications*	21 April 2020	Gov.uk	The Biometrics Commissioner's statement stresses the need for parliamentary oversight, time limitations, and legal safeguards in using any upcoming COVID-19 symptom tracking, contact tracing apps, and immunity certificates, concerning their surveillance potential.
	[G5-CN Text 9] <u>*Zhejiang Responds to Health Code "Upgrade": Privacy Must Be Protected and Voluntariness Respected*</u>	2 June 2020	China News Service	At a press conference, Zhejiang official Chen Guangsheng emphasised that the HCS must continue to evolve with a people-centred, privacy-conscious principle. While recognising its important role in pandemic control and social governance, he emphasised its functional boundaries by stating that future expansions should be lawful, voluntary, and carefully considered data security with public service.
	[G5-CN Text 10] <u>Lawful and Scientific Use of Big Data to Support Epidemic Prevention and Control — Experts Interpret the Notice</u>	9 February 2020	Gov.cn, source from Xinhua	The article provides expert commentary on the central directive, aiming to clarify how to ensure both effective epidemic tracking and personal data protection during the pandemic.

	on Strengthening Personal Information Protection and Using Big Data to Support Joint Prevention and Control			
	[G5-CN Text 10] NHS COVID-19 app: your data and privacy	13 May 2022	NHS	This overview explains how the app safeguards user's privacy, such as the data it collected, how it used it, and user autonomy regarding personal information.

5.4 Analytical process

5.4.1 Analytical Flow

This section explains the process of my discourse analysis in detail with a flow chart. The flow chart shows eight steps which describe the key points of analysis: 1) Data collection, 2) types of materials, 3) extraction of texts, 4) establishment of pragmatic diagnosis, 5) reconstruction of the argumentative move, 6) allocation of positions and sides, 7) critical analysis, and 8) comparison and discussion.

The flow chart is shown in the next page.

1) Collection of data and context information, including the 5W1H and the turning point of an event, the speaker's background.

2) Three types of raw materials:

- i) Politician and corporation speech
- ii) Ministerial and corporation statement

4) Establishing a pragmatic diagnosis/ Selection of argumentative points in discursive practice

3) Extraction of texts from documents/ converting vocal speeches into texts

5) Normative reconstruction of argumentative moves from discourses in order to make an analytic overview and framework

6) Allocation of positions and sides. Finding out the affirmative and the opposite side/ support and contradiction of a discursive

8) Comparison and discussion of the results on a basis of historical

7) Critically analysis of reconstructed materials through a historical approach to discover

1) At the first stage, data and contextual information on biosecuritisation were collected covering the period from February 2020 to June 2022. Key turning points, such as the launch of the NHS Test and Trace programme, the introduction of the NCA and the HCS, and subsequent updates, were documented. The data collection process followed the 5W1H principle, addressing the case (What), motivation (Why), institution (Who), place (Where), timeline (When), and rationale (How) of each event.

2) The raw materials were classified into three categories, as outlined in the second box, and gathered primarily from online sources. Selection followed the principle of establishing a pragmatic frame, requiring that speech content reflect the speaker's position on a specific case. For example, in [G5-UK Text 9], the writer's role was identified as supporting the UK government in balancing public concerns with the need for intrusive data collection.

3) Texts from documents and vocal speeches are extracted after collecting essential materials before reconstructing the texts. Vocal speeches in English are transcribed directly from media materials. The speeches in Mandarin Chinese are translated into English while their dynamic equivalents are considered.

4) The PDA aims at neutralising and eliminating divisions of opinions by focusing on argumentative moves. Therefore, in this stage, I carefully estimated and examined argumentative moves in the texts in order to mark them as a part of the analysis. The marks include the following six key components: claim, grounds, backing, warrant, qualifier, modality, and rebuttal. This model of a critical discussion is a theoretical tool for reconstructing a realistic argumentation. A critical discussion should involve four stages: the start of conflict, arguing, ending, then confirm the division of opinion is resolved or not (van Eemeren et al., 2002, p. 25).

5) A normative reconstruction of argumentative moves from discourses is important for the entire discourse analysis. It means to eliminate/avoid subjective judgment as much as possible. van Eemeren (2011, p. 11) indicate the essential stages of reconstructing an argument in the model of a critical discussion should be the following four stages: 1) the "confrontation stage", the "opening stage", the "argumentation stage", and a "concluding stage". For normatively reconstructing the texts, it is essential to keep and partly paraphrase the original speech or texts in a brief manner in order to make

them easier and clearer for analysis. Then, I rearranged the order of the extracted texts to show the interactivity among the conflicts in a critical discussion model while only keeping argumentative moves that are analytically relevant in resolving a difference of opinion on the merits (van Eemeren, 2011, p. 14). A pragmatic-dialectical analysis shall produce an analytic overview that outline of how the argumentative moves are to be analysed in specific types can be seen (for example, "North Americans are competitive, therefore, Paula will do her utmost' as a "symptomatic argument", and "I do not agree at all, in my opinion, it is just the opposite'"as a "mixed difference of opinion") (van Eemeren, 2011, p. 14). As van Eemeren (2011, p. 14) points out, a reconstructive analysis of argumentative discourse is designed to create the basis for constructing an optimal analytic overview of the discourse that consists of a variety of specific analytic operations. The operations carry out transformations identifying the elements in the discourse that play "a constructive part in resolving a difference of opinion on the merits."

6) At this stage, positions and sides in argumentative moves were allocated on the basis of an analytic overview. The function of this part is to critically discover how the merits have been demonstrated through intertextual moves. It can be helpful in exploring the ideological strategies used in promoting digital biosecurity products and reflecting the motivation beyond the facts. The support and contradiction of argumentative moves in a discursive practice should be located in a clear interactive relation among differences of opinions can be seen. For example, the effectiveness of the NCA in disease control, and its intrusive data collection that is inevitable when it is working.

7) After a normative reconstruction of the raw materials, critical analysis was conducted through a historical approach to prepare differences in ideological strategies for later comparison and discussion. This stage carefully analyses the reconstructed materials with the framework of critical discussion. The CDA improved by DHA with a pragmatic-dialectic theory can exert its function to dig out and uncover the power relations and ideologies behind discursive practice. Overall, the analytical framework focuses on a comparative analysis of key events which are representative of each country's efforts in pandemic control. The combination of the three methods guarantees a complete analysis of which ideological factors were conclusive in the

ideological strategies used in convincing the public to accept biosecuritisation and digital surveillance techniques.

8) Finally, the outcomes of the CDA were compared, and the promotion of biosecurity products was discussed within each political and social context.

5.4.2 Hobb's Framework

Hobb's framework for discourse interpretation is partly adopted for conducting the CDA as a supportive method. The analysis focuses on essential cultural-political elements and ideological strategies within the texts, rather than on sentence structure. Using Hobb's (1985) framework, the following two elements of discourse are analysed in this section: 1. Evaluation, which seeks to reveal the intention of the utterance. 2. Knowledge representation, which aims to find out how the speaker/writer says something that is related to the audience's existing knowledge. These elements are crucial to discovering the power relations and ideological influence in the UK's cultural-political context.

5.4.3 Principles and Process of DHA

Wodak's DHA looks at using existing evidence in real social practice throughout history to improve the quality of CDA. A discourse-historical analysis was conducted in accordance with Wodak's principles of the DHA after the materials were reconstructed through a pragmatic diagnosis.

As a historical approach, literature reviews should take the first place to activate the theoretical knowledge of surveillance culture in different countries. Previous research was reviewed and discussed to build a theoretical basis for applying the DHA in the following chapters, providing a foundation for addressing the research questions and assumptions. The pieces of literature include the mainstream political philosophies in both countries, while their real practice of state surveillance/ citizen control, such as the postcode system and the Huji system, are also noted.

After that, the outcomes of the pragmatic diagnosis were matched with findings from the literature review. The critique was then formulated, the results interpreted, relevant contextual knowledge considered, and Fairclough's three dimensions of critique applied. (Wodak, 2015, p. 12). According to Fairclough (1995), these three dimensions are:

1. The object of analysis (including verbal, visual or verbal and visual texts).

2. The processes by means of which the object is produced and received (writing/ speaking/designing and reading/listening/viewing) by human subjects.

3. The socio-historical conditions which govern these processes.

Each of these three dimensions requires a different kind of analysis:

1. Text analysis (description), which a text is analysed according to the visual and verbal signs.

2. Processing analysis (interpretation), which looks at the coherence and cohesion of utterance (e.g. vocabulary connections between sentences-repetition of words or use of relative words) that the logical connection of meanings can be investigated.

3. Social analysis (explanation), which aims to depict a discourse as part of a social practice and process within a range of relations of power.

The concept of context is an inherent part of the DHA and contributes to its triangulatory principle, which takes into account four levels:

1. The immediate language or text-internal co-text, i.e. the speech.

2. The intertextual and interdiscursive relationships between utterances, texts, genres, and discourses, i.e. references to other relevant events and discourses, such as the CCP's plan to develop a big data society.

3. The extralinguistic social variables and institutional frames of the specific "context of situation", i.e. the choice of the particular date for and location of the event.

4. The broader sociopolitical and historical context in which the discursive practices under examination are embedded and related, i.e. The CCP's plan to develop a data-driven society.

In brief, the role of the DHA in my analytical process examined the power relations behind utterance and texts reconstructed from the samples while keeping linguistic features, including the tone, mood, conjunctions and so on. This model of a CDA is expected to enhance the depth of the later discussion with a variety of empirical theories.

Conclusion

To sum up, the methodology is a combination of different discourse analysis methodologies that interpret discursive practices through critical discussion in order to reveal power relations and ideological strategies in communication. Critical Discourse Analysis (CDA) in this

research is improved by a Discourse-Historical Approach (DHA) with a Pragmatic-dialectic diagnosis so that the real practice of state surveillance and political/ cultural particularities in each national context can be referred in later discussion to understand how newly developed digital surveillance tools are promoted through different ideological strategies.

The cultural and political backgrounds of China and the UK have been briefly explained and compared, raising research questions about how digital surveillance techniques are promoted and justified for pandemic control. Two comparative cultural-political systems are introduced: modern democracy and Western individualism on the one hand, and Confucian ethics and Asian collectivism on the other, which are considered key drivers of divergent surveillance cultures. The use of CDA is justified as it provides deeper insight into ideological strategies manifested in communication through close textual analysis. However, recognising its limitations, CDA is supplemented with DHA and PDA to establish a normative diagnosis and improve objectivity.

The criteria for data selection and the introduction of a comparative framework to delimit the sample range are explained, followed by samples from both countries. Potential challenges in data collection are then addressed. Section 4.5 illustrates the analytical flow, outlining the process step by step. Building on this methodological framework, the next chapter begins the analysis.

Chapter 6 – PDA for UK Corpus

6.1 Chapter Overview and Key Findings

The 10 UK samples collected from February 2020 until June 2022 are investigated in this chapter.

In each subsection of Section 6.2, the argumentation context of the selected samples is first introduced. The texts are then analysed according to the four stages of argumentation: confrontation, opening, argumentation, and conclusion. The Toulmin Argumentation Model is applied to examine the argumentation part in order to reveal how the speaker/writer convinces the audience through explanation. Each subsection concludes with an analysis of the promotional strategy embedded in the discourse.

The key findings that are discussed in Section 6.3 are:

1) Collective moral requirements frequently appear in the samples, indicating that public health measures were framed as ethical duties grounded in social responsibility, not merely technical necessities. This also reflects a Foucauldian form of biopolitics.

2) The UK government and NHS often used an explanatory narrative in communications. It describes how the technology of contact tracing works, thus building trust among potential users.

3) The promotional strategy focused heavily on public concerns about privacy by making sure that the security measures integrated into the app and its design kept user privacy in mind.

4) The communications commonly featured a pleading tone to encourage the use of the app. This approach reflects respect for individual autonomy and seeks to achieve compliance voluntarily by persuasion rather than compulsion, which matches democratic values.

6.2 Pragmatic Discourse Analysis

6.2.1 [G1-UK-Text 1] *Prime Minister's statement on coronavirus (COVID-19): 16 December 2020*

6.2.1.1 Argumentation context

The statement on 16 December 2020 functions as a strategic discursive act during a sensitive stage of the ongoing pandemic. The speaker's primary argumentative purpose is to persuade UK citizens to adopt restraint during the Christmas period while legitimising the government's decision to maintain existing restrictions amid escalating infection rates. This speech combines informative and directive functions with justificatory ones to address public expectations through state control.

6.2.1.2 Text analysis

Confrontation

The confrontation stage [1.1-1.4] starts with Johnson's introduction of the success of the vaccination rollout. The optimistic attitude towards the vaccine he holds gives a sign of victory.

[1.3] However, it was immediately contrasted with a warning that the country remains "in a race" to control the virus through a collective effort. The central tension of the argument is therefore created for arguing the difference in opinions between national celebration and necessary caution. [1.4] Meanwhile, he expresses gratitude and uses "we did" twice to highlight the collective achievement, preparing for a later contrast opening.

Opening

[2-2.6] Johnson acknowledges the renewed risks at the opening stage, beginning with a sharp contrast statement, "but I must be frank with you", to highlight the rising factual infections, such as in London and Kent, to justify policy escalation. This stage sets the starting point of the discussion that the collective needs to protect lives despite emotional expectations about Christmas.

[2.4-2.6] In these three lines, empathy and rational responsibility are invoked to remind the public of the asymptomatic transmission, while self-restraint is framed as a civic and moral duty. A moral and emotional framework is built to make the audience accept his forthcoming call for caution as reasonable and necessary.

Argumentation

[3.2] Johnson supports his first claim, "a small Christmas is a safer Christmas", which is the central standpoint, through a series of pragmatic and moral appeals.

[3.1] This rebuttal is anticipated before the claim to acknowledge people's desire to see family, yet reframes it as a collective ethical choice ("protect yourself and others") rather than an individual right.

[3.3] He qualifies this by stressing that the existing rules ("three households can meet on five days") are maximums, not targets. In this way, legality can be reframed as moral restraint, because the focus from what people are legally allowed to do is shifted to what they ought to do as a moral responsibility to protect others. In other words, he transforms compliance from a matter of state enforcement into a voluntary ethical act, which encourages self-discipline and collective responsibility instead of relying on coercive authority.

[3.5-3.13] The grounds are public health guidance based on evidence, suggesting reducing contact, avoiding travel, and protecting the elderly. These grounds are supported by backings ([3 & 3.7]) from scientific and medical data on infection rates and vaccine progress.

[3.5] This warrant, on the basis of the grounds and backings, implies that limiting social contact can directly reduce transmission risk.

Conclusion

The government's credibility is reaffirmed, and future optimism is given in the conclusion stage. Johnson's closing remarks, "have yourselves a merry little Christmas…and I do mean little", convey both compassion and authority. Sentiment is also shown for softening restrictions. He ends by expressing hope through the prospect of vaccination and recovery by Easter. Thus, the argumentative circle is closed by transforming public sacrifice into a shared step toward restoration.

6.2.1.3 Promotional strategy

A moralised biopolitical discourse is employed in this speech to promote biosecuritised actions that blend scientific authority with ethical self-governance. In this practice, restrictions imposed by the government can be transformed into expressions of both moral and civic responsibility. Voluntariness is specifically implied, yet morally bound to the collective good.

A typical biopolitical control strategy is exemplified, showing governance operates through the self rather than over the self. Continued restriction under this mode is rationalised without appearing authoritarian through embedding factual data within a moral framework. Citizens

become both the subject and the enforcer of biosecurity norms. In doing so, they regulate their own behaviours in accordance with state-defined ethics. As a result, state control is simultaneously depoliticisied.

6.2.2 [G1-UK-Text 2] *Prime Minister's statement on coronavirus (COVID-19)*

6.2.2.1 Argumentation context

On 23 March 2020, Johnson delivered this speech at a critical juncture when the UK government announced its first nationwide lockdown. The key purpose is to persuade citizens to accept unprecedented movement restrictions by framing them as necessary measures to protect the NHS and save lives. Strict behavioural compliance, "you must stay at home", is directed and justified as moral and collective obligations.

6.2.2.2 Text analysis

Confrontation

[1-1.3] The urgency and gravity of the worldwide epidemic are introduced in the confrontation stage. [1&1.1] Johnson describes the pandemic as a devastating national threat, which is "the biggest this country has faced for decades". [1.2] He also uses a rhetorical personification, "an invisible killer," to create a sense of fear. In this stage, a public difference of opinion is established for arguing everyday freedoms versus the need for exceptional controls. It narrows the argumentative space and orients the public toward a single policy trajectory (lockdown).

Opening

[2-2.2] Fundamental premises of the discussion are laid down in this stage. These include shared moral values such as the duty to protect life, factual realities by stating the NHS has limited capacity, and a causal logic which indicates that more deaths will occur once the health system collapses, if transmission cannot be controlled. Strict government intervention can thus be rationalised as an essential approach.

Argumentation

[4] The central standpoint of this speech is explicitly declared as "you must stay at home," which Johnson advances through arguments of pragmatic necessity and negative consequences.

[3.4 & 4.1] Obedience is framed as both a rational and moral imperative by stating the act of staying home as the only reliable way to slow virus transmission, protect the NHS and save lives.

The grounds, [4.2-4.4] and [5-5.2], are presented as behavioural directives that define when citizens are allowed to leave home only for essential needs. These instructions are framed as rational, protective actions rather than forced ones.

Institutional and enforcement backings ([5.3-5.5], [7.2], & [8-8.3]) are used to strengthen the grounds, which include a series of power exercises to support the implementation of behaviour control directives.

Social and economic costs of the restrictions are recognised and included in an added promise of reassessment ([6-6.3] & [7]) that makes the measures seem less harsh and more reasonable. This helps the public see the restrictions as fair and sensible that trust can be built in order to follow them spontaneously.

Later, an inclusive rhetoric ("each and every one of us," and the slogan "stay at home, protect our NHS, save lives", see [9.2-9.3]) is added to convert compliance into a collective duty rather than coercive acceptance.

Conclusion

[9-9.11] The speech closes with a thankful tone and a unifying call to militarised action through using phrases such as "But in this fight we can be in no doubt that each and every one of us is directly enlisted" and "we will beat it together." Individual sacrifice, national strength and a wish for victory are linked together to turn future compliance into a collective act.

6.2.1.4 Promotional strategy

Same as the previous speech the PM delivered on 16 December 2020, this speech advances a biopolitical form of persuasion, making public health a moral imperative while securing public agreement with government control. In this mode, following state instructions, such as staying at home, is portrayed as an act of care and responsibility, not obedience. Meanwhile, collective pronouns ("we," "us," "our") frequently appeared in the entire statement to blur the boundary between the government and the governed public. This tends to create an illusion of participatory unity in this "fight."

6.2.3 [G2-UK-Text 3] *NHS Covid Pass: How can I get a "vaccine passport" and which places will ask you for one?*

6.2.3.1 Argumentation context

The article, published by both the NHS and ITV News, is an informative discourse at a juncture between emergency management and post-lockdown reopening operations in England. Its central argument aims to bring the NHS Covid Pass to the normal and acceptable status of a social and economic restoration tool under a continued public health control approach. There is a biosecuritised communication agenda in the material that combines public health instruction with behavioural guidance.

6.2.3.2 Text analysis

Confrontation

[1-1.1] In the confrontation stage, the Covid "passport" is immediately introduced as a likely and even inevitable feature of post-lockdown life in England. [1.1] signals that proof of two doses could soon be a legal requirement. This brings out the main issue of managing reopening under continued public health risks and concerns over fairness and access. The COVID pass is treated as an already-made decision to limit the range of debate, such as whether it should exist, which mainly focuses on how it will be used.

Opening

[2] The opening uses a Q&A style to set starting points and control definitions, focusing on what the pass is and how to obtain it. This style creates neutrality while establishing authority over key premises.

Argumentation

[3] The central claim is that the pass is a reliable record of vaccination or testing status and a necessary tool for participating safely in social and economic activities. A pragmatic scheme appears here, implying that if citizens wish to regain access to normal public life, they must demonstrate biomedical safety credentials.

[3.1-3.2 & 4.1-4.3] The grounds specify acceptable forms of evidence, such as vaccination, negative test, or natural immunity. Following backings ([5-5.6]) explain ease of access and institutional legitimacy for strengthening the grounds, making citizens more willing to accept it.

A warrant ([6]) and grounds from [6.1-6.5] are provided to indicate that venues may require the pass to prevent transmission in high-risk environments.

Yet, the text also uses qualifiers and rebuttals [7-7.5] to manage potential objections by stressing voluntariness and anti-discrimination safeguards, while simultaneously indicating the possibility of future legal mandates.

[8] The backing provides scientific data to support the legitimacy of the passports, showing that vaccinated populations are far less likely to get a critical condition. This empirical evidence strengthens the rationale for linking vaccination with public safety.

[8.1] A warrant is established by associating widespread vaccination with reduced hospitalisation risk, suggesting that collective immunity protects both individuals and society. This reasoning presents vaccine passports as a practical tool for protecting public health.

[9] A rebuttal recognises concerns about inequality. It is acknowledged that unvaccinated individuals may face social exclusion.

[9.1-9.3] Expert testimony from Professor John Drury is given as a backing. He notes that some groups of people, such as young people, those in deprived areas, and ethnic minorities, are less likely to be vaccinated, and thus more likely to be excluded.

[10] The qualifier then turns to ask how long the passports will be used.

[10.1] The following warrant argues that parliamentary procedure must be followed, and the claim ([10.2]) states that this decision would need to be made in Westminster.

Conclusion

The conclusion [11-11.4] suggests the passports are acceptable if temporary and limited. This stance addresses public concerns about fairness, while biosecuritised action can be normalised.

6.2.3.3 Promotional strategy

This text uses a technocratic-normalising narrative to promote the NHS Covid Pass as a common-sense tool for social recovery. The pass is described as an inevitable instrument of pandemic control in an informational tone that naturalises compliance and reduces space for political debate. Scientific evidence and expert commentary are included, and legal and

ethical issues, such as voluntariness and anti-discrimination, are mentioned to minimise public perceptions of coercion.

6.2.4 [G3-UK-Text 4] *Coronavirus test, track and trace plan launched on Isle of Wight*

6.2.4.1 Argumentation context

The announcement released on 4 May 2020 by the Department of Health and Social Care introduces the NCA as part of the national "test, track and trace" programme. Its primary goal of persuasion is to explain the use of digital contact tracing as a scientific solution to public health crisis management. Both technical explanation and moral persuasion are adopted to enhance effectiveness in convincing. Digital surveillance is normalised through clearly explaining data and privacy protection, which is framed as a necessary measure with less intrusive features to restore normal life.

6.2.4.2 Text analysis

Confrontation

[1-1.5] The announcement constructs the public health crisis as a collective challenge that requires necessary technological intervention. At the beginning, the NCA was immediately introduced as a new tool to contain the virus and support the national pandemic strategy. The argumentative tension then emerged between the need for safety and how to make digital surveillance acceptable as a normalised measure for pandemic control. The Isle of Wight has been chosen as the first testing ground, which is used to demonstrate national unity and technological capacity while narrowing the scope of public debate from whether to use this tool to how it should be implemented.

Opening

[2-2.1] The argument's starting points are established and justified through official coordination and public consent. The plan to "test, track and trace" is described as a shared national task, which will be first tested at a scheduled time and place.

Argumentation

[3, 7.1, & 9] These three main claims all state that the upcoming app can effectively control the spread of the virus and help the country reopen safely.

[5-5.2, 10.2, 25.1, & 26] Grounds are provided to explain how the system works in detail.

[4, 10.3, & 11] For reasoning, the warrants indicate that the app's faster and more accurate tracing reduces infection risks and supports national recovery. Multiple sources of authority, including scientific/ medical experts ([11-12]), institutional partners from NHSX and Public Health England ([7] & [10]), and transparency of data privacy and legal compliance ([14-14.1]) are referenced as given backings to add credibility.

[13-13.1] The inclusion of international examples implies that the UK approach is globally informed yet nationally designed.

Qualifiers ([6] & [11.3]) acknowledge potential limits, such as that some groups may be unable to access smartphones, and the need for more people to use the app.

Rebuttals ([14] & [21]) directly respond to possible worries among the public about privacy and give a fact that this stage is not a lifting of lockdown.

Finally, a claim ([24]) and its backing ([24.1]) link the app to a "moral duty to protect life", suggesting that using it is not only practical but also an ethical responsibility, while the island is leading the way.

[25-26.1] These parts explain the technological mechanism behind the app's operation transparently, such as logging nearby phones through Bluetooth and notifying others anonymously if a user has a positive result. It turns individual use into an act of social responsibility through exchanging well-protected private data for a collective good.

Conclusion

[27-28] In the conclusion part, scientific research and adaptive policy are referred to show that the app has long-term value. It mentions Oxford University's research that "for every one to two people who download the app, an infection could be prevented" to indicate that the participation is a measurable moral action.

6.2.4.3 Promotional strategy

In this official announcement, digital surveillance is framed as a scientific solution for national recovery. Moral persuasion again appeared in this text to justify biosecuritised actions as a collective responsibility based on individual ethics instead of a forced act, as well as the PM's statements analysed above. Public concerns toward data privacy and legality are addressed through referring to official and scientific voices. This type of rhetorical framing turns a mass surveillance plan into a shared civic mission with moral virtue.

6.2.5 [G3-UK-Text 5] *NHS COVID-19 app launches in England and Wales*

6.2.5.1 Argumentation context

The government announcement issued on 25 September 2020 marks the formal launch of the app in England and Wales. Its argumentative goal aims to increase public acceptance and widespread use of the app as a tool to control transmission. The app is described as a coordinated national biosecurity strategy to frame the participation in technological intervention as a civic duty.

6.2.5.2 Text analysis

Confrontation

The text ([1-1.1]) provides the audience with a simple problem-solution message, informing that people are urged to download the "new important tool" as cases are rising. It prepares for the debate about how to roll it out and how to make people easier to accept it.

Opening

[2-2.1] The starting point is fixed at the opening stage that the app is a central part of the NHS Test and Trace service in England and the NHS Wales Test, Trace, Protect programme, available to people above 16, with multiple language support, and backed by the major campaign "Protect your loved ones. Get the app." These together frame the use of this app as a responsible act of citizenship.

Argumentation

[3] The central claim states that the app is safe to use by giving confirmation from the UK's several major mobile network operators.

[3.1-3.2] The grounds describe how the app functions, such as using low-energy Bluetooth to log proximity between users, alerting them to possible exposure, and offering tools for symptom checking, test booking, and result retrieval. These features indicate that the app is an easy-to-use, self-managed method of protecting oneself and others.

[3.3] A second claim states that the app is securely designed. The phrase "it tracks the virus not people, and uses the latest in data security technology to protect privacy" acts to emphasise its well-designed mechanism.

[3.4 & 3.5] The backings offer technological descriptions to add credibility for further reassuring public privacy concerns.

[3.6 & 3.7] These two warrants then link the features to the principles of anonymity and data minimisation, asserting that the app does not store personal details and that "no personal data is shared with the government or the NHS."

[3.7-3.10] Further backings from authoritative voices adds legitimacy and urgency by framing the app as an essential tool on a national scale emergency through crisis rhetoric, such as "tipping point" and "invisible killer". In this way, the argument constructs a narrative of moral duty that leaves little room for democratic scrutiny.

Conclusion

[4] The closing moves from persuasion to regulation that businesses are required by law to display QR codes, and states that the number of businesses that have already downloaded the codes ("more than 160,000") creates a potential bandwagon effect for attracting more businesses to participate. [4.1-4.2] Finally, the mention of major tech companies such as Google and Apple serves to enhance the app's reliability and safety.

6.2.5.3 Promotional strategy

This announcement's purpose is to increase acceptance through explaining the scientific authority and technological trust behind the app. The phrase, "protect their loved ones," encourages the public to use the app as a moral duty. It helps to engage individuals on a more intimate level, making the act of using the app seem essential for the safety of those they care about. The statement, "it tracks the virus, not people", aims to redefine a surveillance instrument as a health protection tool. Additionally, references to anonymised data, randomly generated IDs, and collaboration with trusted major technology companies further mitigated surveillance characteristics in the app.

6.2.6 [G3-UK-Text 6] *Introducing the NHS COVID-19 app*

6.2.6.1 Argumentation context

This statement, published on 6 June 2022 by the NHS, is an introduction to the NHS COVID-19 app, primarily focusing on its privacy protection features. It maintains the acceptance of digital monitoring by framing the app as a safe, privacy-focused tool for living "safely with COVID-19." Apple and Google's technological support is referenced to improve trust and

separate the app from state surveillance. Voluntariness and a moral responsibility of "protecting you and others" are encouraged through the repeated emphasis on user autonomy, such as the option to delete the app or control personal data.

6.2.6.2 Text analysis

Confrontation

[1] The statement begins by establishing the difference of opinion for resolution: whether to continue the digital contact tracing as a part of "living safely with COVID-19." This confronts any potential assumption that such a tool may no longer be needed. The app is described as a "useful tool", which narrows down the space of debate and indicates it will be continued.

Opening

[2] The opening explains the privacy-preserving technology of the app designed by Apple and Google. The phrase, stating it can"help us safely live with COVID-19, and protecting you and others" emphasises its effectiveness while fostering a moral requirement to encourage long-term use.

Argumentation

[3 & 3.6] The two claims explain anonymity as a key technical feature of this exclusive contact tracing app.

[3.1-3.3] Backings then strengthen the claims through describing a series of user functions, such as sending alerts anonymously, providing health guidance, symptom checks, and data storage limited to the user's device.

The warrant [3.4] ("Nobody will know who or where you are") and modality [3.5] ("users can delete all data at any time) function together to enhance the illusion of full autonomy and privacy control.

Conclusion

[4] Finally, the closing specifically highlights that "the more informed we are, the more we're able to protect people at higher risk from COVID-19", turns compliance into a form of collective protection for vulnerable groups while reducing the meaning of government power.

6.2.6.3 Promotional strategy

Maintaining public trust and normalising the ongoing digital surveillance policy is the key orientation of this statement. It uses simple words to inform the audience that they have the right to accept or reject this well-designed app with advanced privacy-preserving technology, and conveys the idea that using the app is a responsible choice to conceal power asymmetries.

6.2.7 [G3-UK Text 7] *NHS COVID-19 App Updates Across England and Wales*

6.2.7.1 Argumentation context

On 29 October 2020, the NHS published this updated information to introduce the app's improved accuracy and user-friendliness. The updates optimised close contact identification and eliminated unnecessary notifications. Privacy and data security are again emphasised by stating the app "tracks the virus, not people". Collaboration with major tech companies and institutions is mentioned to ensure the app's reliability and technological advancement.

6.2.7.2 Text analysis

Confrontation

[1-1.1] At first, the article states that updates to the NCA will optimise its accuracy and user-friendliness. Approximately 40% of adults with eligible smartphones have downloaded the app. [1.2 & 1.3] The updates aim to improve the app's accuracy in identifying close contacts, while unnecessary exposure notifications will be removed to enhance communication for app users. [1.4] The updates are part of ongoing improvements to make the app more effective and easy to use. In this stage, stating a significant percentage of downloads can add social proof to encourage further acceptance of the app.

Opening

[2 & 2.2] Here it again mentions the statistics of downloads, functioning as a stronger emphasis. Updated features explain that the app will improve distance estimation between users. [2.1-2.2] By stating that the updated app will use the latest Google/Apple API developed in collaboration with scientists from The Alan Turing Institute and explaining that the updates can improve Bluetooth detection, it further gives a sense of technological advancement.

Argumentation

[3] The argumentation part opens with the grounds that optimising the app's ability to estimate distance will enable it to identify potential exposure efficiently before isolation.

[3.1] Then, it claims that the updated accuracy will improve the protection of users and people near them.

[3.2] The backing for this claim ([3.1]) is a reassurance of user privacy. It explains that the app focuses on tracking the virus rather than individuals, and the latest data security measures are employed.

[3.3] The warrant supporting the backing ([3.2]) states that the app generates random IDs for devices, which are exchanged via Bluetooth, not GPS.

[3.4-3.6] Further backing provides more details about the app's privacy measures. [4] Another claim then explains the updates that the problem of "ghost" notifications is eliminated and communication clarity is improved.

[4.1-4.4] The product director of NHS Test and Trace provides backing by emphasising the team's efforts to optimise the app's accuracy and user experience for safety. High download rates and QR code generation are stated, with encouragement as a qualifier ([4.5]) of "the more people who use the app, the better it works", to convince people to adopt the app for collective safety reasons.

[5] The quote from a representative from The Alan Turing Institute further backs that the update increases the accuracy of exposure notifications, and those at risk will be notified to self-isolate.

[6] The grounds explain that the app uses a combination of factors to determine the risk threshold for self-isolation notifications. The latest technology improves distance measurement, reducing low-risk notifications without affecting high-risk ones.

[6.1] Another claim is that those who have been notified to self-isolate by the app are now more likely to be at high risk, which is important for controlling virus transmission.

[6.2-6.3] The backings include the adaptability of the risk threshold to the pandemic's stages and further technological updates to refine notifications.

[6.4] A rebuttal acknowledges that more people may be asked to self-isolate, but a qualifier ([6.5]) argues that this increase is necessary, given rising infection rates, to curb virus spread and protect public health.

[7] The topic then shifts to ending "ghost" notifications. [7.1] The claim asserts that eliminating these notifications will make it clearer when users need to self-isolate.

[7.2-7.4] Two backings detail the immediate availability of the update and future interoperability with other UK contact tracing apps. It then attempts to relieve the public's concerns about security issues by stating that the NHS is now consulting with the National Cyber Security Centre about the app's security and reliability.

[7.5] A qualifier notes the expected release date for this update.

[7.6] The warrant for the update is that it will enable users to share anonymous keys with other app users if they test positive. This aims to improve broader virus alert capabilities. Here, it is focused on the aspect of personal choice and anonymity, which implies the idea of self-autonomy when using the app.

[7.7] One more backing commits to a more detailed app data publication. It ensures transparency and accountability.

[8] The background information provides the grounds that the app is accessible to individuals over 16 in England and Wales. It is available in multiple languages and forms an integral part of the national contact tracing programs.

[8.2] The final claim is that the app is a central component in the NHS Test and Trace efforts for identifying contacts of infected persons.

[8.3] And then the grounds highlight the wide adoption of the app with millions of downloads. This helps to maintain and raise its importance and acceptance among the public.

Conclusion

[9] In conclusion, the article again mentions that the contact tracing app will be safe and secure under the cooperation of the NHS, multiple tech companies and institutions, and experts in privacy protection.

6.2.7.3 Promotional strategy

The article states that approximately 40% of adults with eligible smartphones have downloaded the app, which provides social proof that can encourage others to join. Mentioning the collaboration with technology firms and institutions adds a sense of reliability. The text explains that the updates will improve the app's accuracy and remove unnecessary notifications, aiming to inform the audience that the app is more user-friendly. Again, privacy issues are addressed by claiming that the app "tracks the virus, not people"

and advanced data security measures supported by multiple tech companies, institutions and experts in privacy protection.

Furthermore, the phrase "the more people who use the app, the better it works" suggests a collective responsibility.

6.2.8 [G4-UK Text 8] *NHS COVID-19 App Has Been Downloaded Over 10 Million Times*

6.2.8.1 Argumentation context

This announcement was made on 27 September 2020, following the rapid download of the NCA. The smartphone application has achieved 10 million downloads in England and Wales within three days. The app, in this announcement, is introduced as a key component of the NHS Test and Trace programme. It aims to help efficient contact tracing and reduce virus transmission.

6.2.8.2 Text analysis

Confrontation

[1] The confrontation stage starts with emphasising the rapid response from the public. It notes that over 10 million people have downloaded the app, with 6 million downloads on its first day. [1.1] It then sets up the argument that widespread adoption of the app is crucial for its effectiveness in controlling virus transmission.

Opening

[2] The opening stage first explains the app's role in the NHS's pandemic control programmes in England and Wales. [2.1] It states that there is an enthusiastic response from the public, with high ratings from both the Apple and Google Play stores. [2.2] After that, Matt Hancock's comment is quoted. He praises the initial uptake and encourages more downloads, describing the app as an essential tool for personal and group protection. This enhances the idea that downloading the app can benefit and protect both individuals and society.

Argumentation

[3] The argumentation begins with the grounds that the app has been formally put to use over the weekend, with a great number of venue check-ins recorded on Saturday, 26 September.

This establishes the app's immediate uptake and usage by stating a large number to emphasise the government's achievement.

[3.1] The claim posits that QR codes are crucial for the UK government's pandemic control programmes in England and Wales to contact people if COVID-19 outbreaks occur in venues. This asserts the importance of the app in managing potential outbreaks.

[3.2] Then, the warrant expects businesses to ensure customers are aware of QR code rules by displaying posters or keeping contact details logs. It indicates that businesses are responsible for compliance.

[3.3] The backing quotes Dido Harding's statement. She notes the public and businesses' support for the app and advocates a collective effort to fight against the virus.

[3.4] Additional backing is given. It emphasises that the app's contact tracing and venue check-in functions are necessary for protecting each other, and businesses are urged to print and display posters.

[3.5] Further backing includes a campaign to encourage app downloads, with advertisements across various media platforms. It strengthens the propagandistic idea of "Protect your loved ones. Get the app."

[3.6] Simon Thompson's statement is quoted as a backing as well. He states that with 1.5 million venue check-ins, the public has effectively used the app. This backing is intended to gain more public engagement.

[3.7] Thompson then states that everyone downloading the app helps protect themselves and their loved ones. This statement acts as a qualifier that highlights individual responsibility.

[4] Another claim is that the app is a vital tool alongside traditional contact tracing to reduce virus spread, and it is available in multiple languages for users aged 16 and over. The claim serves to introduce the app's well-designed accessibility and utility.

[4.1] The claim ([4]) is backed by adding detailed explanations that the app uses low-energy Bluetooth to track proximity to other users, alerting the user if contact with a positive case nearby. The backing aims to inform the public that the app does not cost a lot of energy on devices, convincing them to be willing to use it.

[4.2-4.3] The two backings indicate that the app advises self-isolation if in contact with a confirmed case, and it can provide medical services such as test booking and symptom

checking, while positive test results can be logged on the app, enhancing its role in virus tracking.

[4.4] to [4.7] are rebuttals to potential privacy concerns by audiences after reading [4] to [4.3]. These rebuttals address privacy concerns by explaining that the app focuses on the purpose of "tracking the virus, not people", and it uses advanced data security.

[4.8] The grounds indicate that potential users are over 16 years old and have compatible phones in England and Wales, which introduces the app's target demographic.

[4.9] Additional backing gives more details about the app's enhanced features: alerting risk levels, enabling QR check-ins, symptom checking, test booking, and self-isolation support. The backings also mention legal requirements for venues to maintain contact logs and display QR code posters. After that, it introduces regulations enforced by local authorities, including fines for non-compliance and rising charges for repeat offenders, stressing the seriousness of consequences caused by non-compliance.

[4.10] Finally, the warrant again mentions businesses' responsibility to ensure customers are aware of QR code rules to emphasise the collaborative effort needed for effective contact tracing.

Conclusion

The textual structure of this announcement lacks a conclusive part.

6.2.8.3 Promotional strategy

At the beginning, the article directly announces that over 10 million people have downloaded the app within a few days, with 6 million downloads on the first day to highlight public approval. A social proof strategy is applied, suggesting that the app is valuable to use according to the vast number of participants. Then, the app is described as a key component of the NHS Test and Trace programme which is essential for reducing virus transmission. Dido Harding's speech is quoted to encourage public and business support for the app, indicating that it should be regarded as a collective responsibility.

Technological accessibility is explained, while potential privacy concerns are addressed by claiming that the app "tracks the virus, not people" to reduce surveillance characteristics.

Legal requirements for businesses to maintain contact logs and display QR codes, along with fines for non-compliance, are introduced to stress the necessity of using the app.

6.2.9 [G5-UK Text 9] *Biometrics Commissioner Statement on the Use of Symptom Tracking Applications*

6.2.9.1 Argumentation context

This article was published on 21 April 2020, a month later of the NHSX's initiation of possible digital biometric solutions. The author was asked by a number of journalists to comment on the upcoming biometric surveillance measures for pandemic control. He wrote this article that concerns the inevitable privacy issues that occur in using such technology and suggested legal treatments. In the meantime, law expert Edwards and other legal professionals proposed the Coronavirus (Safeguards) Bill 2020 to call on proper legal protection for digital interventions in relation to the use of biometric surveillance tools in health emergencies (Edward, et al, 2020).

6.2.9.2 Text analysis

Confrontation

In the confrontation stage [1.1], the author expresses his personal view on the application of biometric surveillance in monitoring the spread of coronavirus.

Despite he has limited responsibility that only focuses on police use of biometrics, he still responded to journalists who were concerned about possible use of these technologies during the public health crisis [1.2].

Because, he believes either police use or medical use of biometrics can cause data privacy issues [1.3].

The confrontation stage seeks to solve one central question: Should Parliament and legislation treat the use of biometrics in health emergencies the same as police use [1.4]?

Opening

[2.1] At the opening stage, a rhetorical question is raised to emphasise the extent to which the public interest in biometrics could outweigh the cost to private rights.

It establishes the objective for the argumentation [3.1-4.2] to persuade the cons among readers that any medical use of biometrics needs to be regulated, as well as the Protection of Freedoms Act 2012 for police use (PoFA).

Moreover, the biometrics commissioner has sufficient professional background in regulation and legislation of such surveillance forms in police use. His specific social role would potentially make the readers rethink the characteristics of biometrics--that should never go beyond the citizen's general right to privacy.

Argumentation

[3.1] The author claims a possible condition for the general public to accept biometric surveillance: if it can keep the threat of coronavirus away. It is true that the UK did need to figure out an effective response to control the rapid spread of coronavirus during that period, and the most possible solution to persuade the public to accept surveillance means easier is to make them feel their lives can be secured by using such applications.

[3.2] The author then rebuts his claim that he does not know whether the COVID-19 pandemic is a long-lasting threat or not.

[3.4] If not, any biometric surveillance means need to be regulated as a time-limited emergent response. He backs that Parliament did make proper regulation to symptom tracking applications, which partly ignored PoFA due to the emergency, and reassures the readers by saying the emergency provision would be "limited initially to 6 months" and relevant regulations are made in consultation with the Biometrics Commissioner.

[4.1] After that, he makes another claim that public trust should be encouraged by regulation approved by Parliament, as well as limiting other forms of surveillance and backs it by providing evidence of other professionals' efforts in limiting surveillance and enhancing data security.

Conclusion

Finally, the author leaves an open conclusion, indicating that the current regulations and legislation are not enough. He again emphasises that such surveillance has to be limited to protect citizen's privacy, and there seems to be a great growth in the state use of new biometric technology, which is boosted by the health crisis. Overall, in this article, he acknowledges the effort made by Parliament to limit the time of using biometric surveillance, yet he still urges Parliament and legislatures to take action to protect citizens' privacy rights.

6.2.9.3 Promotional strategy

The biometrics commissioner acknowledges the significant privacy issues in the use of biometric surveillance technologies. He mainly discusses the necessity for legal safeguards and the importance of privacy rights protection, and suggests that biometric surveillance might be accepted if it can be demonstrated to control the spread of COVID-19 effectively. This article helps to indirectly promote the upcoming disease surveillance tools by advocating transparency, limitation, and privacy protection. Under these conditions, public trust could be improved for accepting such technologies.

6.2.10 [G5-UK Text 10] *NHS COVID-19 app Privacy FAQs: Your Privacy Protected*

6.2.10.1 Argumentation context

This is a pamphlet-style explanation published by the NHS that aims to carefully legitimise the NCA through transparency and technical rationality. A series of frequently asked questions is presented and answered in an instructional and informational tone to address public anxiety about privacy and surveillance. The argumentation context is set within the UK government's effort to promote voluntary adoption of digital contact-tracing technologies while addressing common concerns over data misuse.

This text does not show parts of confrontation, opening, and conclusion due to its original format as an informational FAQ rather than a speech or policy address.

6.2.10.2 Text analysis

Argumentation

[1-2.7] The text opens by bringing out two questions that the public is most concerned about: What data does the app store collect ([1])? And, How can I be sure my data is safe ([2])?

[1.1] The answer for [1], as a ground, details the specific type of data collection, which is limited to three types of data that are held on the device itself (postcode district, symptoms, and QR codes).

[1.2] A qualifier grants users the ability to view and delete their data, indicating that user autonomy is considered in the app's design.

These two questions foreground a common public anxiety regarding privacy and surveillance, and immediately reframes it as a technical issue that can be fixed. It focuses on debating how minimalised local data storage with anonymity protects user data.

[2] The second question is a claim which implies that user data is safe. It is supported by a warrant ([2.1]) that links privacy to minimal data usage and the technological integrity of Apple and Google frameworks.

A string of backings ([2.2-2.7]) then explains anonymisation, temporary identifiers, and automatic deletion to enhance the warrant.

Subsequent claims ([3] & [4]) shift the focus from individual privacy concerns to collective benefit.

[3] This claim is a question asking "what data is shared outside the app?"

[3.1-3.3] The following grounds explain the external data exchange activities necessary for improving pandemic response.

[3.4] The backing again emphasises anonymity, while a warrant ([3.5]) reframes participation as a moral contribution to the NHS and the national effort against the pandemic.

Similarly, the claim ([4]) asks "why does the NHS COVID-19 app ask for my postcode district?" and is justified by grounds ([4.1-4.3]) clarifying its limited precision.

[4.4] The following warrant justifies that this data supports public health planning rather than surveillance.

The text continues with explanatory claims as questions about the venue check-in function ([5]), anonymity in data sharing ([6]), and permission to access the camera ([7]). Each claim is supported by grounds explaining limited data retention ([5.1-5.4]) and anonymised functionality ([6.1-6.2]). Later warrants ([5.2] & [7.1]) frame these features as practical means that would not cause privacy threats. Backings ([6.6], [7.3-7.4]) ensure that the app cannot share personal data or access galleries on devices. Rebuttals ([6.3-6.5]) then admit minimal re-identification risks, yet minimise their significance by comparing them to "traditional contact tracing," thus the rest of the threats can be normalised through analogy.

[8] and [9] The final question-based sections address whether users can delete the app and how long their contact-tracing data is retained. [8.1-8.2] The following grounds explain that the app and its data can be deleted anytime, with backings ([8.3-8.5]) clarifying that users will still be contacted by human contact tracers if they stop using the app. [8.6] After that, a warrant repositions the app as the "fastest way" to stay informed and protect others. [9.1-9.5]

Finally, a series of backings about time-limited storage continues to strengthen proportionality and data minimisation arguments.

6.2.10.3 Promotional strategy

This pamphlet-style document uses a depoliticised technocratic strategy to promote the NCA as a neutral and user-friendly tool. Privacy is framed as a technical guarantee to build trust through transparency. Three main features are explained carefully to address common concerns: 1) user control, 2) anonymity, and 3) locally stored data that can be deleted. These construct a narrative of voluntary participation while framing compliance as a responsible and moral duty.

6.3 Rhetorical Features

6.3.1 Collective Moral Requirements

Public compliance with biosecuritised actions is much moralised in the conduct of communication. This moralisation is necessary because, in a liberal democratic society, extraordinary restrictions demand more than technical justification. They require a normative warrant that transforms emergency control into a collective ethical responsibility. During that time, the UK government and the NHS faced limited enforcement capacity and epidemiological uncertainty. To get the public to act, they instigated an internalised version of regulation. Risk-reducing behaviours, such as staying home, using the app, or showing the pass, were therefore presented as moral acts of caring for each other, particularly the vulnerable.

This moral framing is a practice of biopolitics, as populations are governed by governance, that is, by health and life, as well as people's lives, as opposed to traditional coercive imperatives, unlike those of compulsion and control. The rhetoric of biosecuritisation is also manifested in the communications. It reveals that biological threats are recast and reframed into security issues, moral obligations are vital in handling these (Dillon & Lobo-Guerrero, 2008). This logic renders individual behaviour a site of security production, which is taught to self-regulate as ethical subjects who contribute to the collective safety of society as a whole. Johnson's appeal to "protect the NHS," in particular, shows moralised messaging that connects public health to shared responsibility. And in this sense, the citizen becomes a protector of the common good, or should he or she show self-control as evidence of citizen virtue.

This method of communication, after all, lessens the significance of tight policing and puts the onus of accountability on human beings. It prompts individuals to recognize behaviour on a daily basis as part of their moral responsibility to safeguard others and protect society.

6.3.2 Explanatory Narrative

Through analysing the UK corpus, a predominantly explanatory rhetorical pattern emerged. The UK government and the NHS both offered an explanatory way to persuade the public to comply with biosecuritised actions, including lockdowns, downloading the NCA, and obtaining the COVID-19 passport. In this mode of communication, official communications are more inclined to explain how the policies and surveillance tools operate and are designed,

instead of directly stating the policies and rules. To the extent that the actions were launched and spread, an attempt was made to convince people in the UK to take them up, and the idea being used to talk directly to the British message that it was a public health intervention that dealt with privacy issues. The narrative concentrates on the need to balance the urgency of curbing virus transmission in light of Britain's populace's privacy fears and individual freedoms.

The explanatory narrative helps build trust through transparency, as such communication can aid in promoting the credibility of the communications by demonstrating a deep understanding of the issue and a sincere interest in the audience (Fisher, 1984, p. 15). Under this risk-laden environment, especially as there seems to be a lot of fears involving state surveillance and data privacy when it comes to government trust, it is critical to report the app's contact tracing mechanism and relevant legal principles objectively and clearly.

Public understanding of the technical complexities of the network contact app (NCA) would require a lot of explanation; the majority simply weren't aware of how this type of contact tracing mechanism operates and might raise scepticism about its real use. So the government and the NHS would be inclined to eliminate misinformation and to step up the transparency of the app. For example, [G3-UK-Text 6] states that "any data shared with the app is held on your phone", and that the app can be deleted with all data at any time ([3.3] – [3.5]). This is an education that emphasises the social notion of informed consent and provides individuals decision-making due to good reason or information.

6.3.3 Focusing on Public Concerns About Privacy Issues

Privacy issues were a major concern that the UK government needed to overcome to promote the contact tracing app (Ada Lovelace Institution, 2020). Certainly, the sampled materials consistently emphasise that the app was designed with a top priority on privacy. This includes claims that all in-app activities were secure and personal data would not be accessible to the government or the NHS. These claims are backed by mentioning the involvement of major tech companies and international partners, which aim to improve credibility.

Despite the UK government and the NHS making these efforts, historical context may have shaped the public perception, as the UK has had previous instances that caused public distrust. For example, the Cambridge Analytica Scandal in 2018 which the personal data of millions of Facebook users was harvested for political advertising without consent (Hinds, et al., 2020). Another example is the WannaCry ransomware attack that took place in May 2017,

causing widespread disruption of NHS services and compromising sensitive health information (NHS, 2017). Moreover, the Regulation of Investigatory Powers Act 2000, passed in 2000, has stirred widespread privacy rights debates during its implementation (Chatterjee, 2011). These historical cases could lead to hostile attitudes among citizens toward intrusive data collection. Thus, some proper explanations and justifications are needed to regain public support.

During the early stage of the app's development, the public and some human rights organisations' opinions contributed to reducing privacy concerns and scepticism. Big Brother Watch (2020) argued that the explanation and assurances were insufficient, and the data gathered for pandemic control purposes could be used for other surveillance forms. Carlo, director of Big Brother Watch, raised concern that potential "passports" for more serious diseases would be issued once people all have the app. For instance, people may have to get an HIV test before going to a football match (Big Brother Watch, 2020). The ORG (Open Rights Group) (2020) expressed worries about the app's data handling practices and the potential data abuse beyond its initial purpose. The organisation appealed the need for clear legal frameworks to ensure data protection, and the initial centralised model for the app was scrapped due to this effort (ORG, 2020). The UK Parliament's Joint Committee on Human Rights (2020) also debated the risk of data being used for other purposes and required transparency and accountability in the app's deployment. Therefore, it can be inferred that, in promoting the NCA, focusing on the public's concerns and worries was not only a reflection of democratic principles but also a means for the UK authorities and institutions to rebuild public trust.

6.3.4 Pleading Tone

By normatively reconstructing the sampled official statements, the tone of pleading is maintained on an almost continual basis by the UK government and the NHS, most evident in the speeches of the PM. As a whole, the tone of pleading held sway in communications to the public and in attempts to encourage them to join the government's efforts to address the pandemic. This implies that the UK government and the NHS were wary of biosecuritised actions that are marked by movement curtailment and mass surveillance. They understand that, within the liberal and surveillance culture of the UK, forcing the public to comply with and use such a surveillance app would trigger significant controversy and hostility.

The tone of voice can be read as an acknowledgement of individual autonomy and informed consent. It attempts to honor citizens' autonomy while motivating them to engage in the surveillance project. In this communication strategy, democratic principles are also included; thus, the government needs to convince, influence, and educate, not require citizens to be involved in its policy making. In those cases a detailed explanation and a pleading tone can do the trick: governments want people to be able to make informed choices to accept the app, and therefore may want to address privacy and data security concerns. This form of communication tried to minimize the controversies and hostility that accompany the use of digital surveillance tools.

Chapter Conclusion

In conclusion, the results from the PDA reveal three significant characteristics of the UK officials' and the NHS's communication style during the COVID-19 pandemic, aimed at promoting the NCA and encouraging citizens to participate in their biosecuritised actions, such as lockdown, accepting the app and vaccination pass.

Moralised framing plays a central role, which transforms compliance into an ethical duty grounded in care for others and collective responsibility and reduces traditional coercive enforcement. Transparent explanations about how the app works and its privacy protection mechanisms help the UK government and the NHS to build trust among the public. The sustained focus on privacy protection and data security, supported by the involvement of tech companies, institutions, and privacy experts, aims to reduce fears about related problems and data misuse. The use of a pleading tone ensures the public's autonomy and advocates cooperation through respect and persuasion rather than force.

These rhetorical styles maintain a democratic responsibility and respect for individual autonomy. Biosecurity control can consequently be normalised in an acceptable way within liberal democratic discourse.

Chapter 7 – PDA for China Corpus

7.1 Chapter Overview and Key Findings

This chapter performs a PDA of ten Chinese samples from 12 February 2020 to 26 April 2022 to analyse how the HCS and other biosecuritised actions, mainly mentioned in Xi Jinping's speeches, were discursively constructed and promoted during the COVID-19 pandemic.

The findings are summarised in section 7.3, and three recurrent rhetorical modes emerge in the Chinese state's rhetorical tactics on communicating about HCS:

1) Top-down mode in government communication and less care for public concerns

Throughout the corpus, the official narrative tends to stress state power and to sideline public concerns, especially about privacy issues and personal autonomy. The focus remains on the essential and common good of compliance, leaving limited space for questioning or debate.

The key findings that are discussed in Section 7.3 are:

2) Bureaucratic rhetoric and narrative ambiguities

Many texts in the samples draw on administrative language and technocratic rhetoric that obscure the operational details of surveillance and the handling of data. This bureaucratic rhetoric can create cognitive overload. The policy comes across as technical, routine, and out of the reach of public deliberation. This kind of vagueness serves as a persuasive tool to mitigate scrutiny.

3) Commanding tone

The HCS is depicted as obligatory for entry into the workforce, access to employment, free movement, and social opportunities, effectively turning compliance into an obligation of citizenship. This dogmatic tone silences dissent and rationalises invasive forms of surveillance as what must be done.

7.2 Pragmatic Discourse Analysis

7.2.1 [G1-CN-Text 2] Xi Jinping: Address at the Meeting on Coordinating the Prevention and Control of COVID-19 and Economic and Social Development

7.2.1.1 Argumentation context

The speech delivered by the Chinese president, Xi Jinping, on 23 February 2020 is intended to rally the country for new actions on pandemic control and social-economic recovery. Its central purpose of argumentation has been to rationalize the broadening of state powers and collective mobilisation of society under the reasons of life-safety and national duty in the name of a general story of reopening and national stability. Xi also describes the successful Party leadership response to the pandemic, advocates a widespread involvement of society in the "people's war" and outlines tactical goals for economic recovery. He presents the whole operation as a test of the country's unique political system.

7.2.1.2 Text analysis

Confrontation

At the beginning, the confrontation stage is defined as one of priority and coordination about how to continue pandemic control with economic and social development. [2] The subtitle acts as a retrospective framing device that consolidates Party authority by reviewing past actions as evidence of effective central leadership in epidemic governance. Meanwhile, Xi establishes himself and the Party as the core leaders of the pandemic control strategy. The crisis is described as a unified task under central leadership, and the Party is positioned as both the analytical centre and mobiliser of decision-making. [2.2-2.9] The repeated use of first-person narrative phrases such as "I chaired," "I issued," and "I visited" builds an image of constant personal leadership, showing the Party's unity and strength as a direct extension of the core leader's direct involvement and control.

Opening

[3-5] The speech begins with a summary of collective mobilisation that brings together all levels of the state, including the Party, military force, and society, into one system of action. Epidemic prevention is presented as a coordinated national mission. [4-5] Xi provides concrete evidence in the form of collective actions by Party organisations, medical workers, public security officers, and volunteers that have been coordinated to a unified national response. [4.1-4.2] Their acts were noted as "selfless" and "tireless," while specifically mentioning the people of Wuhan and Hubei showed "great understanding of the broader picture and consciously cooperated with epidemic control efforts."

[6-8] A prominent top-down command system is reflected in a list of central planning and coordination. References to "prompt formulation of strategies," "unified leadership," and "nationwide mobilisation" emphasise the centralisation of authority as essential for efficiency. Local governments, the army, and medical teams are described as executing central orders. This stresses political hierarchy and obedience. Phrases such as "decisive action" and "strict control" present compliance as key to maintaining order.

[9-11] This part unites all local governments, institutions, and social groups under central command. It frames coordination through "joint prevention" and "mass mobilisation." Local independence is erased as uniform action is depicted as vital for stability, with strict control over logistics, transport, and public behaviour presented as essential to the national effort.

[12-14] Information and international communication are managed through "media guidance" and "information release" to ensure message consistency and extending state control globally. The central leadership's authority is again stressed through disciplined communication.

[15-17] Finally, Xi reaffirms collectivistic values and central authority. He directs praise toward institutions within a unified system. The response to the epidemic is described as proof of the nation's strength and disciplined unity under the central leadership.

Argumentation

[18] This subtitle (**Key Priorities for Strengthening Current Epidemic Control**) marks a shift from retrospective praise to prospective command, signalling the continuation of the Party's authoritative leadership.

[18.1] The claim acknowledges achieved progress, yet the epidemic still remains "severe and complex", which requires full-strength prevention efforts to be continued.

[18.2] The grounds describes the situation of the prevention stage as "the most strenuous and critical," implying heightened stakes that justify intensified control.

[18.3] A warrant is then given to explain the path to victory should lies in maintaining high alertness and avoiding mental complacency, such as "fatigue" or "wishful thinking."

[18.4] The backing advocates Party committees and governments at all levels are required to "stand firm" and sustain measures with "undiminished intensity and meticulous attention."

[18.5] A qualifier instructs that success can only be claimed after total victory.

[19 & 19.1] The subtitle (**Resolutely win the battle to defend Hubei and Wuhan**) and the claim use a military metaphor to frame the local epidemic as a battlefield. It signals the beginning of detailed operational orders. Hubei and Whan are linked symbolically to national survival.

[19.5-19.6] Two backings give reasons for actions such as strict grid-based management, comprehensive screening, and enforcement of the "Four Earlies" with "no loopholes."

[19.7] The qualifier indicates travel restrictions must continue for Hubei and Wuhan.

[19.8-19.10] These three backings give supportive instructions for the restrictions, including the integration of traditional Chinese and modern Western medicine, deployment of elite medical teams, and focus on severe cases, which maintain the Party's unique technocratic and militarised logic.

[20 & 20.1] The subtitle (**Ensure effective epidemic control in Beijing**) and claim elevate Beijing as the most crucial spot of national stability, as protecting the capital city is the main task for safeguarding the Party-state. Because Beijing's stability represents the security of the entire political system. Extraordinary control is thus justified.

[20.2] The grounds explains that the state requires preventing both external and internal transmission.

[20.3-20.4] The two backings are instructions for the control of city entry points, personnel management, and coordinated measures with Tianjin and Hubei. They demonstrate hierarchical command and central control necessities.

[21-21.1] The subtitle (**Allocate medical resources and essential supplies wisely**) is a directive about medical resources and essential supplies allocation, and its backing uses the metaphor "use medicine like deploying troops, use doctors like deploying generals" to militarise healthcare logistics. Epidemic response is treated as a wartime strategy, and medical deployment is positioned as an act of tactical command.

[21.2] Medical workers, in this warrant, are portrayed as the "backbone of victory," and their instrumental value is highlighted in the battle against COVID-19.

[21.3] The grounds references to casualties among healthcare workers to introduce a factual basis for central intervention. It also serves to raise urgency and legitimacy for more strict state coordination.

[21.4] Xi's personal instruction on "scientific coordination and logistical support" is a backing to emphasise his role as the central commander overseeing medical deployment.

[22] This claim declares the protection and care of frontline workers as strategic necessities.

[22.1-22.2] The grounds and backing for supporting the claim state that it is essential to provide free treatment and minimise sacrifice for the medical workers. It is an institutional duty, not an individual right.

[23] The claim points out that the persistent supply shortages in Hubei and Wuhan are acknowledged.

[23.1] Therefore, the grounds for the claim call for increasing domestic production and maintaining supply chains.

[24-24.1] This subtitle (**Accelerate scientific and technological research**) and its grounds introduce the virus's limited understanding to justify the need for intensified research.

[24.2] The claim advocates that the state must mobilise multidisciplinary research to investigate the virus and support reopening efforts.

[24.3] A warrant acts as an instruction that vaccines and treatments must integrate research with clinical practice.

[24.4-24.5] The two backings call for collaboration of research institutes, universities, and enterprises to promote clinical breakthroughs safely and effectively.

[25-25.1] The subtitle (**Expand international and regional cooperation**) and grounds associate international cooperation with national prestige. Xi indicates that health security is a shared global issue.

[25.2] The claim maintains the Party's image as a global health guardian rather than a normal participant.

[26-26.1] This subtitle (**Improve media and public communication**) and the following claim link mass communication management to political needs, requiring Party decisions and local successes in pandemic control must be promoted in an active voice.

[26.2] Xi instructs that information should be transparent and accurate to maintain legitimacy.

[26.3-26.4] Two backings further represent Xi's command to keep positive narratives and highlight the frontline workers' stories in order to promote collectivistic values.

[26.5] This phrase functions as both a qualifier and a rebuttal. It indicates that dissents and negative information should be eliminated to achieve the state's public opinion control measures.

[27-27.1] The subtitle (**Safeguard social stability**) and the claim suggest that pandemic control measures must balance control with minimal disruption.

[27.2] Xi provides a backing for the claim that early conflict mediation and psychological support prevent any potential social instability.

[27.3] Furthermore, legal punishments are required to deter potential offenders.

[28-28.1] The subtitle (**Coordinated Promotion of Epidemic Prevention and Control and Economic and Social Development**) and its grounds introduce an integrative directive which merges epidemic governance with economic recovery to demonstrate the central government's ability to maintain control across the country. A transition from crisis management to system normalisation under central coordination is signalled here.

[28.2] Xi claims that resuming economic activities under effective health control is crucial for national stability.

[28.3] This phrase acts as both a warrant and a backing, indicating that economic recovery supports epidemic control, social stability, and the completion of national development goals such as the 13th Five-Year Plan.

[29] The grounds acknowledges the shock to the national economy caused by the pandemic.

[29.1] A following warrant provides dialectical reasoning to sustain confidence and continuity in national development.

[29.2] This backing indicates that long-term economic fundamentals remain "unchanged."

[29.3] The qualifier here defines the disruption as short-term and denies structural vulnerability.

[29.4] This claim states that the Party can still achieve developmental goals through coordination and confidence by "turning crisis into opportunity."

[30-30.1] The subtitle (**Implement targeted and tiered resumption of work and production**) and its grounds serve as a policy operationalisation directive. Xi points out that the initial challenge was central coordination of resources.

[30.2] He gives a warrant that indicates the new challenge is balancing control with recovery.

[30.3] The qualifier warns against "one-size-fits-all" or overly lax policies.

[31] In this claim, differentiated regional prevention strategies are introduced and justified by epidemiological data.

[31.2-31.5] A string of backings suggests that local flexibility is allowed only within state-determined parameters. For instance, low-risk areas resume fully, while high-risk areas remain restricted.

[32-32.1] The subtitle (**Intensify macroeconomic policy adjustments**) and the following claim expand central control over financial instruments to reduce economic impact, and counter-cyclical measures are required to prevent long-term decline.

[32.2] A warrant indicates that fiscal policy must become more proactive.

[32.3-32.6] This string of backings explains a state-directed market correction model with a combination of financial measures.

[33-33.1] This subtitle (**Strengthen employment support across the board**) and the following claim represent a social governance directive that declares employment-first policy is a national priority under the Party's framework of stability management.

[33.2] The warrant suggest that burdens, stabilising jobs, and expanding employment are simultaneous imperatives.

[33.3-33.4] The two backings explain that subsidies, social insurance reductions, and enterprise support are operationalised as tools of control over the labour market.

[33.5] The grounds encourage "point-to-point" transport for migrant workers.

[33.6-33.8] The three backings emphasise flexible employment, digital administration, and graduate placement.

[34-34.2] This subtitle (**Complete the poverty alleviation mission**), with the following grounds and qualifier, transfers the topic to existing challenges of the national poverty alleviation mission impacted by the pandemic. Xi insists that efforts must be redoubled to ensure all goals are achieved.

[34.3] He claims that he demands precise coordination in dispatching and receiving migrant labour to ensure the orderly return of workers suffering from poverty.

[34.4-34.6] The backings indicate that local employment must be expanded by reopening poverty alleviation enterprises and workshops, restoring agricultural distribution channels, and strengthening anti-relapse mechanisms to prevent households from falling back into poverty due to the epidemic.

[35-35.2] This subtitle (**Promote full recovery of enterprise operations**) and the following claim and grounds call for the clearing of logistical and labour bottlenecks under differentiated control measures, noting that restrictions on freight and mobility have hindered production and distribution.

[35.3-35.5] The warrant and two backings explain that economic interdependence needs coordinated regional action to synchronise supply chains. Domestic demand must be stimulated through infrastructure and construction projects supported by central investment, special bonds, and policy banks.

[36-36.2] This subtitle (**Secure spring agricultural production**) and the following grounds with a claim identify the protection of agricultural production continuity as a national priority that should be continued without delay.

[36.3-36.6] This combination of backings and qualifiers stresses the timely provision of agricultural supplies and the need to carry out spring sowing on schedule, even in affected regions such as Hubei. It explains that since most agricultural work is conducted outdoors, restrictions should be eased to avoid unnecessary delays, while also highlighting the importance of controlling major animal diseases and promoting aquaculture and livestock development.

[37-37.1] This subtitle (**Safeguard basic livelihoods**) and the grounds recognise that reduced incomes and rising prices have heightened public hardship.

[37.2-37.3] The claim and its backing explain that the implementation of food supply systems will stabilise food supply and prevent price surges.

[37.4-37.7] The warrant and two backings indicate that essential services must remain accessible. Service industries should resume, social safety nets must be reinforced, and subsidies adjusted to support affected households.

[37.8-37.10] Following grounds and backing direct that care must be extended to vulnerable groups such as the elderly, children, and the disabled through regular visits and continued healthcare access.

[38.1-38.3] This subtitle (**Stabilise foreign trade and foreign investment**), with a following claim and backing, asserts that industrial and supply chains must function smoothly to preserve China's global market position. Export tax rebates, credit insurance, and logistical facilitation are to be fully utilised.

[38.4-38.7] In the subsequent warrant and backing, foreign trade and investment are portrayed as key drivers of recovery. Priority should be given to completing major foreign-invested projects, further opening financial sectors, improving the business environment, and sustaining investor confidence.

[39] (Subtitle: **Strengthening the Party's Leadership in Coordinating Epidemic Prevention and Control with Economic and Social Development**)

Xi opens this section by emphasising that the pandemic is a comprehensive test of the Party's leadership and discipline. Through the metaphor *"It is in turbulent seas that we see the true character of a hero"* ([39.1]), he positions the epidemic as a proving ground for cadres and Party organisations.

The argument's core claim ([39.3]) demands that Party organisations at all levels assume leadership responsibility, ensuring that the Party Central Committee's directives are executed precisely and visibly ([39.4]).

[40-41] Xi advances a warrant that a cadre's true political quality is revealed in moments of crisis.

[40.2–40.5] The string of grounds contrasts the overall competence of most officials with the irresponsibility of a few who exhibit bureaucratic inertia, avoidance, or even desertion.

[40.6] The claim that such behaviours "must be firmly corrected" strengthens accountability through discipline.

[41-41.2] The subsequent claim, with a warrant and backing, constructs the ideal Communist cadre as one who "steps up in critical moments," embodying revolutionary perseverance and leading by example.

[42-42.1] Two backings extend Xi's argument by elaborating on the qualities expected of Party cadres: responsibility, compassion, vigilance, and the capacity to translate ideological commitment into practical action.

[43] The following claim and a backing introduce evaluation and reward mechanisms that outstanding cadres are to be promoted, while in the warrant ([43.1]), negligent ones are warned of facing punishment.

[43.4-43.6] The series of backings presents recognition through awards and expedited Party membership as mechanisms that serve both as incentives for performance and as instruments of ideological affirmation.

[44.4-44.6] This claim, with its backing and warrant, requires Party committees to support frontline cadres materially and administratively, accompanied by backings that call for reduced bureaucratic burdens and formalism.

[44.7-44.8] This claim and a warrant explain that "winning this people's war" depends fundamentally on mass mobilisation.

[44.9-44.14] Multiple backings prescribe the active participation of mass organisations, community networks, industry associations, and charities, which are all coordinated under Party oversight.

[45] In this grounds, Xi concludes by framing the epidemic as both a governance challenge and an opportunity for systemic reform.

[45.1-45.3] The claim, with its backing and warrant, instructs that legal, institutional, and medical structures must be upgraded to strengthen national preparedness.

[46] In the final claim, he advances a preventative approach, linking hygiene, grassroots healthcare, and ideological mobilisation through the Patriotic Health Campaign to the principle of early intervention.

Conclusion

[47–50] In the conclusion, Xi advances three central claims structured around implementation, vigilance, and competence. The first claim ([47.1-47.3]) urges cadres to ensure thorough execution of policies despite growing challenges, grounding it in the need to meet national economic and social targets under pandemic pressure. The second ([47.4-47.6]) stresses risk awareness, backed by references to his earlier warnings in 2018, warranting continuous vigilance as essential to stability and proactive governance. The third claim ([48-48.2]) calls for improving governance and professional capability, implying that bureaucratic strength is a precondition for effective control. The speech ends with a historical resilience ([49–50]), asserting that under the Party's leadership and the unity of the people, China will overcome the epidemic and achieve its national objectives.

7.2.1.3 Promotional strategy

In Xi's speech, a distinctly hierarchical communication model that combines political authority with ideological mobilisation is found.

A top-down communication structure reflects that the central government, under Xi's directives, has absolute authority exercising upon all levels' directives from provincial, municipal, to institutional. Coordination is articulated as vertical obedience rather than dialogic cooperation.

Leader-centred narrative emphasises this communicative hierarchy. Xi sets his role as the planner and commander of the pandemic control effort. He frequently used the first-person pronoun, such as "I chaired," "I issued," and "I visited" ([2.2-2.9]), to personalise decision-making and transform institutional actions into direct extensions of his agency. Moreover, the evaluation of cadres further embeds the core leader's authority within bureaucratic performance mechanisms.

The ethical foundation of the entire communicative framework is constituted by a collectivistic ideological framework. Xi's speech consistently dissolves individual agency into collective purpose through phrases such as "mobilise, organise, and unite the people" and "full mobilisation, full deployment, full strengthening" ([6.10]; [44.1]; [44.7–44.14]). Overall, Xi's speech transforms epidemic management into a symbolic reaffirmation of centralised leadership and the ideological coherence of the Chinese state.

7.2.2 [G1-CN-Text 2] *Xi Jinping: Speech at the National Commendation Conference for the Fight Against COVID-19*

7.2.2.1 Argumentation context

This speech was delivered by Xi Jinping on 8 September 2020, after the initial containment of COVID-19. It enhances the legitimacy of the central government's decisions and redefines the pandemic as both a health crisis and a political test. The Party is positioned as the ultimate guarantor of stability and the citizens' well-being.

Again, Xi places himself as the core commander of a "people's war." His role is emphasised as the strategic leader who foresaw and guided the nation's overall pandemic response. In this narrative pattern, his personal authority is integrated into collective achievement, and the image of the core leader is merged with the Party and the nation.

Its primary purpose is to transform the health crisis into a political and ideological triumph that validates the Party's governance capacity and institutional efficiency. The pandemic control outcomes are framed as proof of the superiority of socialism with Chinese characteristics and the unifying strength of the Party-state system. Individual sacrifice and collective efforts are highly praised to sustain national pride.

7.2.2.2 Text analysis

Confrontation

Xi starts the speech by framing the pandemic as a shared struggle and a success of Party leadership. [1-1.3] The initial address describes the epidemic as an "extraordinarily arduous historical test." China's response is portrayed as a heroic national effort that has led to a "major strategic victory." This sets up the argument that the Party's leadership is key to this success, turning a health crisis into a political win. [2-2.1] The announcement of the National Commendation Conference acts as a display that celebrates joint achievements. It also strengthens the Party's authority through public recognition and ceremonial awards. [3-4.3] Xi's expressions of gratitude extend across social sectors, ethnic groups, and international partners. These present the struggle as inclusive and unified under the Party's command. The confrontation here is not with the virus alone but with any doubt about the Party's competence or solidarity. It frames loyalty, sacrifice, and central coordination as the only legitimate responses to crisis.

Opening

In the opening stage, Xi shifts from collective celebration to a tone of serious reflection. He broadens the emotional and moral scope of his address. [5-5.2] China's experience was placed in an international context by acknowledging the global spread of COVID-19. This type of narrative shows the nation as empathetic and morally aware instead of isolated. His expression of grief for both domestic heroes and global victims creates a unifying emotional appeal that humanises the Party's discourse while strengthening national solidarity. Thus, this opening softens the authoritative tone of the confrontation stage, placing the audience in anticipation of a narrative of moral leadership and communal compassion in the service of the Party.

Argumentation

[6-6.4] The claim and its supporting grounds describe COVID-19 as an "exceptional crisis," or as "the most severe global pandemic in a century." This framing views it as a governance challenge as well as a moral issue. The premise "people and life come first" transforms a public health imperative into a core tenet, establishing the justification for government action in terms of its moral authority. "It is a people's war" and "blockade battle" references turn this ideology into a military crusade, an actionable fight against the virus is a national war, in need of discipline and obedience.

[7-7.2] These grounds and backing quantify success by timeframes and numbers — control in one month, decline in two, victory in three — giving a sense of precision, speed and ability. The framing of "decisive victories" and "annihilation battles" only militarise the message, implying that success stems from the unity of a central command over decentralised public health management.

[8-8.1] The warrant connects control of the epidemic with rapid restoration of social and economic order, making recovery a signal of systemic superiority. The backing lauds the "Chinese spirit," "strength" and "responsibility," turning practical changes into symbols that underscore the success of the socialist system.

[9-11.1] The justification and claims describe the centralised decision making as evidence of the Party's ability to organise. Repeatedly used euphemisms "overall leadership," "decisive decisions" and "extraordinary measures" make the phrase sound like a top-down communication system that the Party's centre has authority and legitimacy. Support for strategic planning and continued policy shifts confirms the narrative of a rational, scientifically motivated leadership that is still, at its essence, political.

[12-12.2] The series of confirmations traces back to institutional actors—the Central Leading Group, the State Council process and the "Four Earlies"—for active examples of being the mechanisms of central control. These demonstrate bureaucratic exactitude as they demonstrate the principle of unified command.

[13-14] The assertion that "no patient was left unattended" transforms humanitarian care into a political performance. But the backings that draw on free treatment and medical integration alongside scientific advancements blend a kindness of the state with technical prowess, suggesting a government that is both caring and efficient.

[15] The development of an "objective, truthful, open and transparent" information system is itself a self-legitimising claim. It frames controlled communication as openness and fosters trust in the Party's narrative control.

[16-16.1] The claim and backing relating to overseas citizens extend the Party's moral and administrative influence beyond the boundaries of the Party's own borders, as the state is a father figure protecting the lives of its global inhabitants.

[17-17.1] The transition to "routine control" represents adaptive governance as well as presenting flexibility as a novel means of maintaining stability. The supporting references to improved detection and management affirm bureaucratic discipline in a system that is ultimately centrally managed.

[18-18.3] The grounds and backings capture the united struggle of the nation, with all sectors, including civil, military, scientific and social, to be part of a single command system. The term "three-dimensional control" and "maximising protection" come to the end of this section, reaffirming the ideological and organisational totality of Party-led governance, where obedience, coordination and unity are not merely practical requirements, but also the utmost political values.

[19] The claim depicts the Chinese people as the same people, the unified front. This public reaction becomes a symbol of national solidarity. It advances the level of the people from compliance to moral heroism (emotional support that also entails political loyalty).

[20-21.3] The grounds and detailed backing centre on Hubei and Wuhan as the epicentre of both the crisis and the country's recovery. The repetition of "victory in Wuhan means victory for the nation" transforms local success into a national symbol of resilience and teamwork. The move to build hospitals so quickly and plan out logistics is portrayed not only as successes in terms of efficiency but also as markers of central planning as well as group discipline, emphasising the state's ability to mobilise fully under crisis circumstances.

[22-23.5] The series of backing emphasises participation at all levels of society, from state-owned enterprises, community workers, the military, to scientists, volunteers and couriers, creating a broad narrative of inclusivity. This turns personal actions into the outputs of state objectives. The reference to more than 4.6 million grassroots Party organisations and millions of workers thus naturalises hierarchical unity, where all operate under the Party's direction but at the same time support a common cause. This sequence constructs a model of national mobilisation that obfuscates the boundary between civic duty and political obedience.

[24-24.4] The rebuttal and other supportive backings prompt emotional reciprocity via a "cheers for Wuhan" theme. This establishes an emotional bond between citizens and the nation. Public slogans like "Wuhan will win, China will win" function as ritualised expressions of morale, turning common speech into a political performance. The central authority and the citizens become closed-loop communicative agents, closing the dialogue cycle of unity, loyalty, and thankfulness.

[25-25.3] The claim and its backing are a tribute to the people of Wuhan and Hubei, a moral illustration of community sacrifice. Their suffering is cast as a strategic need, "buying crucial time" to secure national victory, transmuting suffering into patriotic grace. To remember their struggle is to legitimise their survival and make it into moral evidence for the state's story of triumph.

[26-27.1] The grounds and support for the medical workers depict them as both warriors and martyrs, embodying the ideal of the "marching against the tide." These composite images link professional obligation with the ideology of the individual. The precise numbers (540,000 workers on the ground here, 40,000 reinforcements) all lend credence to this moral uplift, translating statistics into symbols of unity and heroism.

[28-28.1] The grounds and the backing present the military's mission as "treating the epidemic as an order," which strengthens the connection between medical and military activities. This link codifies obedience and sacrifice into a single ideological framework, in which health work becomes part and parcel of national defence.

[29-30.1] The visceral images of suffering, including scars, sweat, exhaustion, and death, relate a concept of agony to its physical manifestation in the life of a character, building emotional connections. The claim asserts that medical care workers constructed "an iron wall" against the virus upholds a central metaphor of resistance and solidarity and closes the section with an image of collective endurance in the service of nationhood. In recounting this narrative, Xi constructs an elaborate narrative of solidarity, where personal initiative, local self-sacrifice, and national sovereignty work together under the moral and political authority of the Party.

[31] In the claim, "China's medical professionals have shown remarkable responsibility," individual exemplars of professional dedication are shown as the foundation of the collective success in pandemic control. It represents a movement away from group heroism toward individual instances of excellence, converting institutional efficiency to individual dedication.

[32-32.7] The supportive backings form a profile of national heroes that mixes dedication, emotional and symbolic appeals. References to people like Zhang Dingyu and Zhong Nanshan personalise the abstract concept of "responsibility." They illustrate self-sacrifice, humility and perseverance as moralistic values of socialist citizenship. Quotes from doctors and citizens, such as "I must run faster" and "as long as you are here, we feel safe," serve as personal testimonials, combining one person's account with a community's gratitude. Repeated praise, "the most beautiful angels," "the most admirable people of our time," makes them a symbol of individual sacrifice. This emotionally high spot concludes with a proclamation that their names "will be engraved on the monument of the People's Republic," converting individual self-sacrifice into an enduring symbol of state-sanctioned virtue.

[32.8-33.1] The warrant connects moral recognition with policy legitimacy, suggesting that coordinated activism and wide-ranging governance enable health and economic recovery equally. This story depicts the Party as the rational force capable of ensuring a harmonious recovery and the control of epidemics. The focus on "law-based" and "science-based" governance reinterprets bureaucratic management as scientific correctness, as well as emphasising the concept of central and legal authority.

[34-34.1] The grounds and backings bring that argument to macroeconomic governance. Because the stability of a country is due to careful planning and the insight of the Party. The "Six Stabilities" and "Six Guarantees" stand as anchor points that make abstract leadership characteristics, including steadfastness, caution and fairness. Relief programs, employment interventions and market-driven solutions are not treated as late responses, but as deliberate displays of ideological virtuosity, revealing the Party's capacity to provide not only income, but also allegiance.

[35-35.1] The subsequent backings expand the definition of success to cover social and regional recovery. The recovery of economic sectors and the targeted assistance to Hubei are representations of the total restoration of the country. And school reopenings are the pinnacle of this tale, suggesting a restoration of everything under Party control. In doing so, they present a compelling case, in conjunction with one another, for the integration of moral virtue, centralised control, and scientific authority in the Party's capability to re-establish stability and advance, thereby linking the moral dimensions of personal sacrifice to the institution of power for the organisation.

[36-36.1] The additional provisions further this story of recovery and social equity. They connect epidemic response with the fulfilment of national poverty reduction priorities. Xi's argument ties recovery from public health crises with economic health in the long run, by spotlighting the need for industrial renewal in impoverished areas and job creation for vulnerable families. This link expands the definition of success from immediate containment to resiliency at a structural level. It positions pandemic control as part of a longer journey of national development and effective governance.

[37-37.2] The statement that China was "the first major economy to resume growth" is an important point to demonstrate national capability and economic resilience. It is supported by successes in both epidemic control and economic recovery. It tells a story about domestic stability and world leadership. The argument makes China's governance model especially effective for revitalising the economy. It positions this success as both substantive evidence and ideological endorsement. The following backing that China "joined hands with countries around the world" extends the claim outward. It sets national recovery in the context of an international collaborative process, depicting China's rebound as an activity that has helped build global solidarity rather than antagonism.

[38-38.5] In the next claim and the subsequent backings, the focus is on transparency and responsibility. The actions mentioned previously, including notifying the WHO early, publishing the viral genome, sharing treatment protocols, and hosting international exchanges, bring these narratives a procedural credibility. Through listing these actions, Xi seeks to blunt criticism that it undermines information sharing. Now his objective is to reframe China as a trustworthy partner in governance for global health. Both the focus on openness and the establishment of a "COVID-19 knowledge centre" help to uphold China's self-image as a knowledge-sharing nation. It presents scientific data management as a showcase for reliability.

[39-39.4] The next claim emphasises international assistance owing to domestic successes by saying China enabled the global fight against COVID-19 even as it grappled internally. The numbers serve as backings, such as money donated, doctors brought in to treat the afflicted, and shipping supplies, which provide evidence of China's contribution around the world. These statistics demonstrate an effective story of kindness, with a large scope and plan, regarding China's humanitarian efforts. Presenting help as "the utmost effort," China places strong emphasis on global responsibility, depicting itself as proactive and essential to resolving international emergencies.

[40-40.2] Some billions of masks, protective suits, and testing kits are among the exported materials that back the claim above. These details can do two things. First, they show logistics strength and production capability as strategic assets. Second, they offer China as a supplier of global public goods. The magnitude of distribution transforms economic productivity into geopolitical clout, positioning supply chains as instruments of soft power and legitimacy on the world stage.

[40.3] The last claim raises the argument further than contribution to a deeper aspiration. The invitation to "build a global community of health for all" and claim that China's actions "helped save countless lives" articulates an ideological universalism in the conduct of China's foreign policy. Xi links practical aid to the vision of a "shared future for mankind", turning pandemic diplomacy into something far broader, a moral and political compass for China's global role. This final contention combines logistical success with humanitarian messages, making a seamless argument for leadership in which China's domestic system of governance seamlessly ushers in global governance advocacy.

[41-41.6] The claim that the younger generation embodies "the hope of the nation" places youth at the essential position of China's ongoing strength. The reason for that ([41.1-41.5]]) uses a combination of grounds, backings, and a warrant that underlines an active responsibility of these young medical workers. The way they responded to the crisis connects generation-to-generation memory and responsibility. [41.3] Reference to the 2003 SARS outbreak builds a narrative connecting different generations through the obligation of nationhood, as the young repay the protection once received from their predecessors by contributing in the present. [41.4] The notion of "heroes emerge from ordinary people" redefines participation in the public sphere as improvisational civic action. This supports the display of community through public applause.

[42-42.2] The next claim changes the attention from people to national systems. It posits that China's success during the pandemic highlights the leadership of the Party and the effectiveness of the socialist system. Supporting backings help strengthen this claim by offering support for institutional robustness, social bonds, and cultural richness as a source of interrelated resilience. For this reason, political power and national unity are complementary, a kind of easy story which goes smoothly under Party leadership with the possibility to cooperate.

[43-43.2] Xi further makes a claim to praise the "great spirit of combating COVID-19," defining it as the "putting people and life first" principle. The backings link this viewpoint to China's long-standing culture and political style, combining traditional notions of communal wellbeing with the Party's emphasis on the people, making such ideas part of the party's historical context. This relationship contextualises the control of the pandemic in a history of governance and social obligation.

[44-44.6] In this claim ([44]), strict measures, such as the Wuhan lockdown, explain these actions are essential components of effective state management. The grounds and backings use clearly collective images, medical care workers, soldiers, and volunteers, to show national solidarity. Stipulating slogans and colour-coordinating symbols allow for mass participation to be visually mirrored as a unity, and they reveal how community action parallels executive orders.

[45-45.3] The emphasis on individual sacrifice in this claim and its backings makes the magnitude of participation concrete, transforming abstract dedication into real acts of devotion. These bolster points show that the national response was both disciplined and duty-bound, a joint one.

[46] The warrant concludes the argument by referring to the Chinese people's ability to move "courageously into danger." The fight against the virus signifies national endurance and coordination, that collective will and central direction are essential elements in China's system of governance.

[47-47.3] This subtitle, with its claim and supporting backings, emphasises "**Respect for Science**" as a key component of the Chinese response to the pandemic. Xi positions scientific pragmatism and innovation as manifestations of national character. The supporting details, encompassing medical integration, treatment development, mass testing, and digital tracing, demonstrate science as both a practical instrument and a ground of governance legitimacy. From this perspective, scientific rationality is transformed into a means to prove that the state was efficient and show that the Party's technical prowess had merit and was a reflection of itself.

[48-48.4] The subtitle "**Shared Future**" is indicative of a turn toward international and ideological outreach. The claim links what China is doing to a broader global narrative of global responsibility, which comes under the "One World, One Family" narrative. The backings specify humanitarian aid and cross-border support as evidence for solidarity and for peace and governance centred on reconciliation. The warrant generalises these actions under the ideological agenda of "a community with a shared future for mankind," and to the extent possible, frames China's pandemic diplomacy as a model of responsible global leadership instead of just crisis management.

[49-49.4] The subtitle "**The Enduring Power of Spirit**" reconceives the pandemic discourse around national identity and continuity. The first quote on spirit provides its cultural anchoring, and the claim and supporting specifics connect the "anti-epidemic spirit" with patriotism, collectivism, and socialism. Xi integrates cultural traditions and ideological beliefs to create a moral regime that allows unified actions and beliefs to be weapons in the fight for national rejuvenation. The warrant appeals to transform this spirit into the driving force behind China's long-term development vision. The subtitle "Profound Lessons and Valuable Experience" provides a transitional vehicle, transforming what we learn in retrospection into the foundation upon which the future government will emerge. The proverb before the claim places hardship in a teaching context: pain brings experience, and struggle leads to knowledge. The following claim that China "draws vital conclusions" lifts the speech above memorialization and past memory to a consolidation of ideology, a shift from action to reflection on the past and from achievement to institutional learning.

[51-54] The subtitle "**The Leadership of the CPC**" stresses the Party's position as the ultimate leader against the threat to the nation's survival and development. The claim makes the CPC's leadership the "most reliable backbone," but the supporting details and grounds emphasise its deep connection with the people, as displayed by the 25,000 new Party memberships during the crisis. This idea is universalised by the warrant, where the national success in crises is essentially predicated on Party control. This section thus reinforces political legitimacy through performance in times of crisis.

[52-52.3] The subtitle "**The Willpower of the People**" turns people's collective endurance into a symbolic resource. The claim and backing celebrate perseverance as the key ingredient to victory, and the unity and discipline of people are seen as essential backing to Party leadership. The phrase "We are all proud to be Chinese" delivers what an emotional discharge is: unity across nation-states, as well as an internal sense through shared identity that makes them patriotic people. The subtitle "The Strength of the Socialist System" continues the argument that connects administrative ability with an ideological structure. The claim says socialism was making China's rapid mobilisation and coordination possible. The backing provides proof of organisational superiority through national unity, being able to respond. This section builds on the former political storyline about institutional advantage, showing socialism as being resilient in times of emergency.

[53.1-53.2] This subtitle (**The Strength of the Socialist System**) and the backing present pandemic governance as a demonstration of system-level superiority. The claim frames organisational and mobilisation capacity of the socialist system as a key reason for success, implicitly linking pandemic effectiveness to political legitimacy. The backing emphasises rapid nationwide action as proof of this superiority, turning crisis response into structural validation.

[54-54.2] The subtitle "**The Power of Comprehensive National Strength**" integrates economic and institutional elements of China's success. This ability lies in years of development and reform, as grounds of stability that is based on the accumulation of resources. The claim that daily life remained stable, even amid social pauses, is a fuller statement that China's structural strength and governance ability allow for both endurance and continuity, the basis of national confidence.

Conclusion

[55-55.3] The conclusion concludes key aspects of the national story: Party leadership, cultural confidence, and socialism's union with Chinese characteristics. Xi links these in a single trajectory of progress. He provides both a basis for national rejuvenation in cultural strength and ideological unity.

[56-57] For them, the emphasis on cultural values such as loyalty to families, shared family responsibility and discipline transforms cultural heritage into a resource for collective strength. The pandemic can also be seen as an enactment of these values at work, as the unity and dedication of 1.4 billion people reaffirm the country's strong legacy.

[58-60.2] Xi argues that cooperation and solidarity are the only effective answers to global issues. He makes China's model of collective action a moral compass and a practical guide for leadership worldwide. In doing so, this section implicitly criticises unilateralism and blaming. It sets divisive actions against China's endorsement of cooperation and multilateralism.

[61-62] The vision of a "shared future for mankind" is restated as the foundation of just global governance. This goes back to national governance. Xi links the control of epidemic development through reform, development and security to the wider strategic goals of the "Two Centenary Goals."

[63-65] He frames the Party's leadership as a stable force, even in a world that is filled with global uncertainty. Continual vigilance in epidemic prevention is highlighted as a fundamental need for long-term survival. There is a strong public participation, public health, medical research and infrastructure improvements with all public involvement. This indicates that well-governed societies are linked to national health. It portrays economic recovery and social welfare as evidence of that.

[70-74] Policies like the "Six Stabilities" and "Six Guarantees" show that governance continues to prioritise the people and retains overall economic and institutional strength. The pandemic is described as a test run on the national governance system.

[75-77] Xi advocates for the enhancement of crisis management to deal with institutional weaknesses and to advance biosafety awareness on how to resolve these failures. He sees the lessons of the pandemic as a call for both institutional reform and better management.

[78-82] China's role around the world is reiterated with pledges of continued cooperation, assistance and involvement in multilateral governance. The goal of shaping a global health community translates domestic ideas on governance into an international political vision based on interdependence and shared responsibility.

[83-88] The speech turns toward encouragement as the burden of that suffering is the foundation of rebirth. Adversity is seen only as an advantage, and uncertainty as something that can be turned into strength, which is in keeping with China's long-standing narrative that strives to move forward through struggle.

[89-93.1] Closing parts integrate continuity of history through continuity into the future progress, as China continues the theme left and right. In order to promote unity and determination, Xi appeals to public discourse and national memory, turning over cultural proverbs and traditional wisdom and national history, as well as a sense of unity and determination. He closes with his call to action and for faith in the Party's pathway to rejuvenation, declaring that no outside power is able to stop China from moving forward in a stronger, more prosperous future.

7.2.2.3 Promotional strategy

The promotional strategy behind the speech sets up a strong narrative of authority, cohesion and legitimacy with Xi and the Party represented as the locus of the nation's mobilisation centre. It depicts epidemic control and economic recovery as achievements that are central to the leaders at the top, and with crisis management transformed into a model of national solidarity and collective discipline. The top-down communication model of management helps translate obedience into patriotic action and ties the success that China achieved with domestic governance to that of China in world affairs. The speech transforms country achievements into soft power diplomacy by portraying China as a responsible power that provides aid, shares research and advances a "shared future for mankind." It relies on appeals to science, institutional strength, and socialist values to present the response as evidence of system effectiveness.

7.2.3 [G2-CN-Text 3] *Travel: Yellow or Red Health Code Holders Not Allowed to Enter Train Stations*

7.2.3.1 Argumentation context

The official news report on People.cn, sourced from Beijing Youth Daily, published on 6 August 2021, features full implementation of the HCS across Beijing's railway network. It illustrates the connection between epidemic control and urban governance. The report presents digital health verification as an essential public safety tool and an important mobility management tool. The narrative normalises surveillance by using procedural language. It presents technological monitoring and citizen compliance as standard civic duties. In this view, pandemic prevention turns into a way to organise society, integrating biosecurity into daily mobility and strengthening the control logic found in China's larger digital governance model.

7.2.3.2 Text analysis

Confrontation

[1-1.1] The confrontation starts with magnifying the challenge of managing public safety during an epidemic. It presents mandatory Health Code checks as essential for social control. Classifying passengers into green, yellow, and red codes simplifies the complex health status for easier management. Mass surveillance is framed as a technical necessity, prioritising control over mobility and privacy while using digital health verification to enforce behaviour and shared responsibility.

Opening

[2-2.3] The first section extends the epidemic control into the national surveillance framework. [2] 100% verification of Health Codes on all incoming trains transforms prevention into a total monitoring system. [2.1] Deploying human resources for such manual checks adds visible discipline to digital control. [2.2] Loudspeaker reminders to open the "Beijing Health Kit" app make a constant compliance routine. [2.3] Excluding passengers with yellow or red codes connects public mobility with technology validation, ensuring safety as a requirement for civic participation.

Argumentation

This part makes an argument that normalises high-intensity biosecurity control in everyday mobility spaces. [3] The claim states that central station areas are now isolated and designated with "specific access channels" in cooperation with railway authorities. This collaboration provides organisational backing to what effectively segments public space into different risk zones.

The reasoning outlined in the warrant ([3.1]) helps to see the governing logic perfectly, which involves the management of high-risk passengers and preventing them from contacting others. Biosecuritisation is visible here because people are sorted, routed, and separated to match their risk status.

The reasoning behind this interpretation is also supported and elaborated in the backings ([3.2-3.3]). Closed-loop transfer and centralised quarantine for close and secondary contacts [3.2] highlight a biopolitical practice, a way of organising group movement and containment in response to population-level contagion. [3.3] The final backing establishes an extra layer of regulation which extends across time, staffing patrols, advice on dispersal, instructions on masks and crowding and distancing, making the station a micro-level society of control.

Conclusion

[4-4.2] At last, the conclusion part extends the Health Code system beyond the intercity to suburban rail networks. It asks the passengers to present a green code before entry. This policy combines identity verification with mobility control, making compliance necessary for participation in urban life. It establishes a structure in which consistent movement is linked to constant health monitoring and government control.

7.2.3.3 Promotional strategy

This report rationalises digital surveillance as a logical and protective necessity for citizens. It links individual behaviour with community safety. The report describes adherence to the HCS as an act of discipline and social responsibility, bringing biosecurity into daily life through everyday movement. It links technological monitoring to government efficiency and public safety. This depiction positions the system as proof of effective governance and national progress. In this way, surveillance is redefined as a means for unity and advancement within China's approach to controlled order.

7.2.4 [G3-CN-Text 4] *Health Codes: A Fast Track to Resuming Work and Economic Activity*

7.2.4.1 Argumentation context

The report published on 22 March 2020 by Xinhua, sourced from Guangming Daily, constructs a narrative of governance efficiency through the national expansion of the HCS. It also represents interprovincial coordination and technological integration as proof of effective

state management, turning epidemic control into a demonstration of digital modernity. Health Codes are presented as a biosecurity solution and governance innovation, which is integrated into daily activities. This narrative frames compliance as taking part in collective recovery. Through such framing, the report advocates a technocratic vision of governance that would synthesise technology and control into a coherent system of biopolitical order.

7.2.4.2 Text analysis

Confrontation

[1-1.2] In the confrontation stage, the resumption of high-speed railway services is presented as a restoration of the nation and a coordinated effort. The cautious movement of 1,631 migrant workers demonstrates the ways mobility is being reintegrated under rigorous health regulations. Movement is now dependent on confirming Health Codes and negative test results. This view of returning to work marries economic recovery with health oversight, positioning it as a demonstration of careful management. The 40,000 additional workers that will be expected to follow turns this into a collective effort for managed reconstruction. It shows the ways in which biopolitical order and economic needs are related to state-managed mobility.

Opening

[2–3] The opening changes the story from regional recovery to overall integration. [2] A focus on the well-organised return of production ties local activity to national coordination. [2.1] Mao Qunan's official statement relates the cooperation of Health Codes to a wider digital governance regime. Here, inter-provincial recognition functions as a technical success, as well as an exercise in control. [3] The last line, framed as a journalistic question, retains the veil of transparency and responsiveness. It calls for continual improvements in the surveillance system as a legitimate and proper governance process that is reasonable.

Argumentation

The confrontation comes down to administrative problem-solving with the claim in [3.1], which treats mobility in terms of procedural compliance rather than a political or ethical concern. This formulation conveys that access is not a question of rights, but of following prescribed digital steps.

This detail in the grounds ([3.2]) provides multiple state-approved platforms through which relevant registrations are required, exemplifying the infrastructural integration of governance with major private digital ecosystems.

Under the principle expressed in the qualifier ([3.3]), a green code acts as a digital signature of trust, allowing for movement only after the verification of the data. It reflects a biosecuritisation process whereby bodily health becomes algorithmic status in its translation, while mobility morphs into a conditional right mediated by digital systems.

Next, Zhejiang is positioned as the experimental frontier for the normalisation of digital mobility management. While the grounds ([4]) indicate Hangzhou's acceptance of returning workers from Hubei, the warrant ([4.2]) credits early uptake of the Health Code for effectiveness. The backing in [4.1] supports this by presenting the green code as sufficient for bypassing quarantine, making algorithmic assessment a substitute for public health judgment.

The presentation of Yuhang District's digital innovation serves to highlight the interaction between the government and main tech firms. This warrant ([5.2]) demonstrates the combination of public authority and private digital power, so that corporate applications such as Alipay and Alibaba Cloud evolve into a kind of state governance tool.

Therefore, the backing ([5.1]) presents digitisation as the rational solution to administrative inefficiency, yet the rebuttal ([5.3]) humanises the project through the testimonials of its developers, masking how the system embeds technological surveillance into everyday governance. The biopolitical logic of maximising visibility of the public through corporate-state synergy is represented by this mixture of efficiency and compliance.

[6] The claim indicates that the introduction of the "Yuhang Green Code", which allows residents to travel and return to work, is a major milestone in the formalisation of digital surveillance as part of public administration. The backing ([6.1]) presents the red-yellow-green coding scheme, which visually categorises citizens into risk levels. This categorisation makes biopolitical control possible as the class of life and movement is controlled through colour-coded information.

[7-7.2] The argument is extended from local government control to productivity at the national level. The backing ([7.1]) connects reopening policies to code usage, linking health discipline with national recovery. The grounds ([7]) and warrant ([7.2]) frame Health Codes as mechanisms of large-scale return to work linking biosecurity and economic rationality.

[8-8.2] The argument ranges from regional innovation to national integration. As represented by the claim ([8]), the growth of the Health Code system to 200 cities can be read as synonymous with administrative effectiveness and digital governance ability. The support ([8.1]) demonstrates the implementation of Alipay as a channel of access in 25 provinces, integrating state authority with private platform infrastructure. The qualifier ([8.2]) introduces the "national version" produced under the auspices of the State Council as an institutional culmination of this system, turning local health management outwards and into a nationwide mechanism of biosecuritisation and embedding surveillance within the logic of the society of control.

The qualifier ([8.2]) draws attention to the introduction of a national version of the Health Code, which transfigures a fragmented patchwork of systems in the community into an integrated digital network. This move centralises surveillance power on one state-driven platform. Hence, it integrates epidemic containment within a wider system of governance and data centralisation.

[9-9.2] The reasoning extends the reach of the Health Code from national law to cross-border application. The grounds ([9]) refer to the introduction of an international version that covers overseas Chinese and foreign nationals with digital biosecurity in Zhejiang. The backing ([9.1]) illustrates how the colour-coded logic of classification is exported and recontextualised (i.e., translating national risk management into global regulation). The warrant ([9.2]) employs large-scale issuance data to justify this expansion, portraying biosecuritisation as a successful, standardised process of transnational mobility control.

[10-10.1] This part locates the argument within a humanised story of returning personnel, translating control over movements under control through mobility management. The grounds ([10]) detail workers coming under monitoring and scrutiny coming in on the ground, the backing ([10.1]) indicates the combination of medical examination and digital verification. Between them, they manifest biopolitical normalising, in which health checks and code verification become habitual acts of compliance folded into quotidian movement.

[11-11.2] The argument centres around institutional trust in data-guided governance. The claim ([11]) signifies Baiyun District's acknowledgement of Hubei codes as an achievement in interoperability. The warrant ([11.1]) equates digital verification with biological safety, while the backing ([11.2]) transforms this administrative action into reassurances for citizens.

The discourse consequently reinforces a society of control where trust in data stands in for human judgment and government power becomes natural through algorithmic trust.

[12-12.1] In grounds ([12]), they demonstrate that administrative coordination at the district level is a result of digital monitoring. The backing ([12.1]) describes the logistical solution of the returning workers, and presents the entire process as a completely smooth process. This image naturalises surveillance and managerial intrusion, framing them as the inevitable parts of efficient governance, embedding control in the daily operation of labour.

[13-13.1] The claim moves to the emphasis of technological efficiency as a virtue. The grounds ([13]) reflect local adaptation using automated data recognition, while the warrant ([13.1]) uses the five-minute verification process to represent governance speed. So there's the tendency to present a technocratic version of biopolitics, in which precision of algorithm becomes equated with political competence and legitimacy.

[14-14.4] This part reconceptualises large-scale data integration as a solution to fragmented governance. The claim ([14]) frames mutual recognition as the disruption of "data silos" and unification as forward progression. The support ([14.1]) and qualification ([14.2]) tie travel freedom to data access and describe Health Codes a requirement for travel. Then the rebuttal ([14.3]) re-engages control by excluding the unregistered via quarantine; finally, the backing ([14.4]) justifies this system according to the interprovincial coordination. Combined, these statements become an institutionalised biosecurity network. It is inclusive through compliance, and is exclusionary through non-participation.

[15-15.2] The grounds ([15]) and backing ([15.1]) trace the early cooperation of Zhejiang with other provinces, creating a model of interprovincial solidarity. In the warrant ([15.2]) regional collaboration is converted into a story of national convergence as they demonstrate how technical integration functions to achieve political centralisation. This reasoning reaffirms the nation as a biopolitical entity via digital infrastructure.

[16-16.2] The claim ([16]) offers the principle of "one-time registration," simplifying mobility but ultimately leading to increased reliance on centralised identification systems. Supporting ([16.1]) depicts that efficiency in terms of user convenience, concealing the consolidation of control. The grounds ([16.2]) states the case of migrant workers travelling with only digital codes, illustrating how individual movement is entirely governed by algorithmic validation, embodying an end-to-end logic of the society of control.

[17-17.3] Data sharing as a national standard legitimises surveillance through bureaucratic language, grounds ([17.1]) and backing ([17.2]), which describes it as "foundational data sharing." The argument ([17.3]) describes three tracks through mutual recognition, making it possible to establish the unification of regional systems within the context of the national code. This formalises biosecurity governance as a law-like practice; it codifies digital oversight as a standard system of power.

[18-18.3] The argument prospects resistance, describing disparities as the "weak links." The claim ([18]) frames inconsistency as a problem rather than surveillance. Although the grounds ([18.1]) assign problems to localised variation, and the backing ([18.2]) relies on a "low-risk" statistic as a guarantee for the effectiveness of control. The qualifier ([18.3]) solves this problem by asserting data alignment to the central standards, thereby positioning algorithmic authority as the ultimate referee for governance.

[19-20.1] The final part wraps up the argument with testimony from experts. The grounds ([19]) attribute to legal scholars to authorise the system, and the claim ([20]) describes the Health Code's introduction as "necessary and timely." The warrant ([20.1]) invokes legality and informed consent, presenting surveillance as governed by the Cybersecurity Law framework. This serves the purpose of legitimising biopolitical governance as both lawful and moral, and the conversation closes with an image of a rational, disciplined and secure digital state.

Conclusion

[20.2] The conclusion provides a cautionary perspective amid the generally optimistic narrative. Zhu's prioritisation of protecting sensitive health data acknowledges a tension in effort that may sometimes be at odds with privacy.

7.2.4.3 Promotional strategy

This report frames the HCS as a demonstration of modernised governance. Health Codes are promoted as tools to support returning workers, but what is actually advertised is a new regime of mobility in which access to trains, cities and workplaces depends on algorithmic categorisation. Human bodies are transmuted into colour codes, risk scores and interoperable data objects that can cross platforms and provinces. The standard of the society of control is also reflected that movement is not stopped at a fixed point but continuously modulated through QR scans, platform log-ins, and across-database mutual recognition.

The references to efficiency, convenience and "one-time registration for multi-region use" are more focused on data integration, which is a more convenient form of user-friendly optimisation than expansion of surveillance capability.

Expert legal commentary and appeals to the Cybersecurity Law reframe a broad apparatus of population management as legally necessary and technically rational.

7.2.5 [G3-CN-Text 5] *Zhejiang Rolls Out Health Code System Today*

7.2.5.1 Argumentation context

The Health Code in both technical and efficient governance terms is described in this report published by Qianjiang Video on 12 February 2020. This logic integrates the green code with the ability to work, study, or live, normalising digital verification as a condition for social engagement. This framing institutionalises biopolitical regulation of daily life. The vice director of Zhangjiang Provincial Big Data Bureau, Ruzhong Jiang, gives an announcement of the Health Code's roll-out at this day's press conference. Jiang's speech is trimmed and reorganised to fit the questions in this news report.

7.2.5.2 Text analysis

Confrontation

[1.1] The broadcaster states that a green code is necessary for travelling to the city. [1.2-1.3] It explains the function of the green code, indicates that the code is a "passport" for all social activities, and people must verify their green codes to get permission for "working, studying, and living." [1.4-1.5] By saying this, it makes clear that the Health Code brings ease to the citizens. This also implies that the disease control policies caused inconvenience to people. In the later confrontation stage, it introduces the basic purposes of the Health Code system and is ready to ask detailed questions in the opening stage.

Opening

[2.1-2.2] In the opening stage, the broadcaster asks two questions which people restricted by disease control policies in the rest of Zhejiang Province may ask. The two questions can be concluded in one: Does the Health Code only serve Hangzhou city? [2.3] Then, an authoritative person's speech will answer the questions.

Argumentation

[3.1] At the beginning of this part, Jiang gives a direct claim, saying that the Health Code's operation is based on real citizen information and has a background verification system. Returning people must apply online, and a code will be issued after verification. [3.2] This is the ground for supporting the claim he made. He uses the term "digital passport" to describe the necessity of using the Health Code because it is as important as a passport to indicate its indispensability. [3.3] Then he introduces a backing to support the ground to tell the audience that the code is available in the whole city.

[4.1] The broadcaster quotes Jiang's statement and makes a claim to inform the audiences that the Health Code system will cover and serve the whole province.

[5.1] Jiang makes a warrant to support the claim by explaining that the framework and relevant regulations of information-sharing activities are made up by the government department. However, the information he provides is vague, and the audience cannot exactly understand what the "framework" is and the "principles of information-sharing activities." The terms he uses in the original language are generally bureaucratic cliches that are difficult to translate. The accuracy of this part's translation cannot be ensured. It is not a proper translation. The purpose of his cliches may have a psycholinguistic effect to subtly deceive the audience when receiving fast linguistic signal flows while creating an authoritative and official atmosphere to make the audience accept them without critical thinking. (see Chapter 10). [5.2] Then he adds a backing to let the audiences know that supportive policies and regulations will follow up.

Conclusion

[6.1] The broadcaster ends this media report with a brief conclusion that the Health Code system will soon be available for the whole province.

7.2.5.3 Promotional strategy

The argumentation stage is mostly informative and descriptive. It focuses on the Health Code's promotion and lacks critical arguments involved with people's concerns on privacy rights and information security, despite mentioning the "principles" in a very vague and bureaucratic manner.

This text aims to elaborate on the indispensability and mandatory nature of using the Health Code. It reflects the characteristics of the Chinese government's authoritarian model during the pandemic. The Health Code is described as a "passport" that only those holding a green

code can be ensured to participate in normal work, study, and all social activities. The rollout of this system is depicted as bringing great convenience to citizens, thereby urging people whose daily activities are restricted during lockdown to use it.

7.2.6 [G3-CN-Text 6] *One Person One Code, Big Data Helps Precise Pandemic Prevention*

7.2.6.1 Argumentation context

The text is a journalistic article from Xinhua Net published on 19 February 2020. It details the implementation of the HCS in Zhejiang province, which utilises big data technology to monitor and analyse the epidemic situation to carry out precise prevention measures and guide the resumption of work. The argumentation within the text introduces the efficacy and necessity of this new system in helping pandemic control while supporting economic recovery.

7.2.6.2 Text analysis

Confrontation

The confrontation stage establishes the context and the issues by introducing the implementation of the Health Code system in Zhejiang Province.

Opening

The opening stage first provides a specific example of how the Health Code system is being utilised in practice. The primary function of the system, which uses big data for epidemic monitoring analysis, is highlighted. This explains the problem of epidemic management and the need for precise prevention and control measures to help the resumption of work.

Argumentation

First of all, the claim [3] brings out the main argument that shifting to a precision intelligent control system using the Health Code system will effectively manage individuals, ensure the freedom of healthy individuals and allow employees to return to work. [3.1] The grounds explain that citizens can declare their personal health information on the Alipay platform, and two backings ([3.2] & [3.3]) give detailed information about the system's operating mechanism by introducing the technology behind it. This aims to educate the audience that the system is reliable and effective in managing the movement of individuals based on their health condition. Another ground ([3.4]) further provides information about the number of registrations, illustrating the rapid implementation of the system. [3.5] The warrant's

discursive function is to connect the grounds and backings to the claim ([3]) by quoting an official's speech. It gives explanatory information about the dynamic management capability of the Health Code system and justifies the system's necessity and effectiveness as it allows the government to coordinate urban epidemic prevention and control comprehensively.

Conclusion

Another official's comment is quoted in the conclusion stage to summarise the effectiveness and importance of the Health Code system. It especially mentions the merit of big data technology in coordinating epidemic prevention and control while ensuring the resumption of work. Militarised propaganda appeared in the official's comment. He says the system can "lay the foundation for winning the overall battle of epidemic prevention and control" because "it makes various work arrangements more precise and effective". This helps citizens to feel reliable about the government's plan.

7.2.6.3 Promotional strategy

This text primarily focuses on the "one person, one code" model. It gives positive comments on the ease of use and precision control capabilities of big data. This suggests that the Chinese government tend to promote the effectiveness of technology in pandemic prevention and behavioural control. The absence of any explanation on privacy or freedom issues may also indicate that Chinese citizens have a considerable degree of acceptance and adaptability to surveillance activities. Additionally, militarised discourse, such as "winning the overall battle," is used in government officials' comments on the system. It creates a context for using high-tech weapons in a war. This might lead the public more willing to cooperate with the government's use of the system.

7.2.7 [G3-CN Text 7] *Shanghai Optimised Code Issuing Rules of "Suishenma", Issuing Red Codes to Five Types of People, Yellow* Codes *to Four types of people*

7.2.7.1 Argumentation context

This official announcement, published on 26 April 2020 by *the Paper*, reflects the extent of biosecuritisation, showing that algorithmic control directs people's lives through differentiated categories of health status. The text takes a bureaucratic and procedural tone to legitimise algorithmic classification as scientific as well as necessary. It presents regular optimisation of Suishenma's rules as evidence of responsible governance.

7.2.7.2 Text Analysis

This text does not appear to have a confrontation, opening, and conclusion stage. It starts with a direct argumentation.

Argumentation

[1] The claim brings out the main argument that the regulations and policies regarding the Suishenma system are being optimised. It sets the stage for the explanation of these updates. [2] The grounds provides a factual basis for the claim, indicating the reference to a newly published government document regarding to the Suishenma system's management regulation and operational requirements. [2.1] The following warrant gives the information that five types of people will be issued with red codes. [2.2-2.3] These two statements are backings for providing specific examples and detailed criteria that support the warrant. They explain why those individuals will receive red or yellow codes, thereby substantiating the optimisation of regulations mentioned in the claim. The concept of "sub-close contact" indicates a more strict criterion on population control, while the concept of "the untested of should-be-tested" implies strong mandatory compliance. [2.4] Finally, the qualifier clarifies the conditions under which the red codes are issued and can be changed to green.

7.2.7.3 Promotional strategy

This is a straightforward official directive regarding which groups will be classified as red codes and yellow codes. The text reveals that the Shanghai government is strict in the classification and management of risk populations. This model is a clear example of top-down communication which uses a commanding tone to require public cooperation.

7.2.8 [G4-CN Text 8] *Zhejiang Can Both Ensure Business Reopens and Disease Control with the Help of Big Data*

7.2.8.1 Argumentation context

The news report was published on 20 February 2020 by People's Daily, 7 days after the launch of the HCS in Zhejiang Province. It links economic recovery to health governance, presenting the HCS as a technological solution that ensures safety and productivity. The colour-coded system translates health into algorithmic data, embedding citizens within a network of continuous monitoring. This reflects Deleuze's society of control which movement and labour rely on digital validation.

7.2.8.2 Text analysis

Confrontation

[1-1.2] The confrontation stage starts with a portrait of 300 returning workers on a train and introduces one of the 300 who was expecting the convenience of the Health Code to inform the audience that it is a necessary and efficient tool for life during the COVID-19 crisis. The confrontative point implies the topic of argumentation that is: Does the Health Code make life easier?

Opening

[2-2.1] The opening stage uses the example of a CEO who praises the green code policy. It confirms the argumentation's orientation that this news piece supports and explains the benefits of the policy.

Argumentation

[3] At first, the grounds immediately state that the Health Code is developed and employed by the Hangzhou Government. [3.1] Because of that, it claims the digital tool is convenient for returners.

[4] These are the grounds which list the function of the Health Code that will be discussed in real cases afterwards.

[5] This claim quotes a government officer's explanation of codes in different colours. [5.1] A ground supports the claim that this solution is designed for an urgent need to both ensure the returners and local residents' safety. [5.1] As a warrant, the officer adds that this digital tool is developed on the advantage of Hangzhou's digital prosperity.

[6] The grounds state that the Health Code is formally employed in Hangzhou city. [6.1] This claim uses an example to demonstrate how fast and efficiently can the digital tool spot risky individuals. [6.2] Then, it backs the claim by the volunteer's experience that it only took 15 minutes from spotting a person with a yellow code and transferring to quarantine facilities to show the quick response and coordination of China's pandemic control reactions.

[7] Here it specifically introduces the key functions of the Health Code as a grounds. [7.1] According to the grounds, the claim gives the result of the Health Code's operation in one specific street area. [7.2-7.3] After that, two warrants state reasons why this digital tool is necessary to be employed: 1. The efficiency of community disease control and accuracy can

be greatly improved. 2. A large number of returners need to be managed properly. [7.4-7.5] Therefore, it claims that this is a challenge for the second phase of pandemic control by quoting an officer's comment because it helps make non-local workers easier to return and provides data support to city management.

[8] Finally, a claim shows the outcomes of applying the Health Code while bearing the principle of ensuring both pandemic control and business reopening. [8.1] To support the claim, a backing gives a decrease number of infections in Hangzhou from the highest 19 cases to single digits after the Health Code's rollout.

Conclusion

[9] As a result of the benefits of employing the Health Code, this article ends with an official announcement that more functions will be introduced in the future operation of this system.

7.2.8.3 Promotional strategy

This news report consistently praises the crucial role of the Health Code in economic resumption and lockdown enforcement, repeatedly emphasising how the system has made life easier during the pandemic. It highlights Hangzhou's existing digital prosperity and includes an example of a volunteer who quickly transferred a yellow code holder to quarantine facilities within just 15 minutes, demonstrating the system's effectiveness. Finally, it uses the significantly reduced infection numbers to prove the effectiveness of the Health Code system based on big data analysis. These elements aim to promote the Zhejiang government's technological strengths to the public in order to increase public trust in the Health Code system. This information provides the public with a sense of security when using the Health Code.

7.2.9 [G5-CN Text 9] *Lawful and Scientific Use of Big Data to Support Epidemic Prevention and Control — Experts Interpret the Notice on Strengthening Personal Information Protection and Using Big Data to Support Joint Prevention and Control*

7.2.9.1 Argumentation context

This article comes at a moment when the Health Code is transitioning from an emergency tool to a long-term governance instrument. Public unease over expanding functions and privacy risks is beginning to surface, and local experiments, such as Hangzhou's gradient-colour code, have raised questions about how far the system may reach. The government

responds by presenting itself as both innovator and regulator: it acknowledges concerns but channels them into discussions of refinement rather than restriction. The overall context is one of managing emerging criticism while consolidating the Health Code's role in routine governance, positioning expansion as sensible, lawful and aligned with social order.

7.2.9.2 Text analysis

Confrontation

The confrontation structures the question as one of how the Health Code should evolve, not if it should evolve. [1] Language like "iterative upgrading" and "expanded applications" suggests continual development as a requisite. Yet, [1.1-1.2] propose the question as a matter of reconciling administrative rectification with public needs only when the HCS is still central to governance. In [1.3], the use of Zhejiang's "precision and intelligent control" frames digital surveillance as its natural foundation, restricting the space to debate its legitimacy.

Opening

This opening reassigns authority to state agents. In [2], Chen Guangsheng claims that expansion has "reasonable boundaries," indicating a controlled and orderly process while leaving the legitimacy of expansion unquestioned. In [2.1], privacy and voluntariness are portrayed as internal conditions to be managed within the system, not as independent limits that might constrain state power. This framing emphasises the idea that the state determines both the scope of surveillance and the rules governing its restraint, keeping oversight entirely within the existing governance structure.

Argumentation

[3] The grounds bring up the earlier popular interest in the "gradient-colour" Health Code and explain why such an expansion is now being discussed.

[3.1] Given this, the claim suggests that the key question is how to use big data responsibly, expanding Health Code applications.

[4] This is a claim that suggests it requires development as the epidemic-control tasks remain significant. [4.1] There is backing for this by the claim that in the area of regularised epidemic control, the Health Code remains useful within practice.

[5] The following claim indicates that some areas are thinking of expanding the Health Code into part of a wider service code and stresses its previous success in putting society back to normal function.

[5.1] The qualifier adds that such expansion has to be within "reasonable boundaries," but the limits themselves are ambiguous.

[6] There are three prerequisites under the warrant that should inform Health Code use: being in concert with epidemic prevention; respecting personal privacy; and being within legal and voluntary boundaries.

[7] The rationale is to emphasise the early nature of the Health Code as a public health emergency management tool.

[7.1] For a warrant, it implies that any expansion beyond such a range should be considered with caution.

[7.2] A following qualifier notes that newer technologies can go further than originally intended.

[7.3] They indicate that if extended uses need to depend on voluntary participation rather than coercion, privacy and service concerns can be judiciously catered towards.

Conclusion

[8] The end of the conclusion's appeal towards the Health Code is a call for "do what ought to be done", instead of a real setting of practical limits. It strengthens the state's power over defining acceptable uses, portraying optimisation as the way forward. The system is positioned as a permanent and legitimate instrument of governance, privacy and voluntariness embedded into its logic rather than being set up as constraints on its expansion.

7.2.9.3 Promotional strategy

The promotional effort frames the Health Code's expansion as cautious and people-centred, while gradually tightening the screws of digital surveillance over everyday life. The talking points about boundaries, conditions and voluntariness present state data systems as restrained and protective, while expansion and long-term embedding are taken for granted. Technocratic discourse about optimisation and risk management moves the discussion away from power and rights, transforming a political project of population monitoring into a technical issue of system design.

Privacy appears as a variable to be tuned inside the infrastructure, not a principle that can actually bring data collection to a stop or reverse. "Voluntariness" functions largely as a comfort term, since access to services and mobility is increasingly premised on code participation.

7.2.10 [G5-CN Text 10] *How to Balance the Public Interest and Personal Privacy in the Use of Personal Information*

7.2.10.1 Argumentation context

This Xinhua report, published on 2 July 2020, frames pandemic surveillance as lawful, scientific, and ethically sound governance. It merges legality, expertise, and technology to portray biosecuritisation as a rational necessity rather than a form of control. Privacy concerns are managed through bureaucratic language, while consent becomes symbolic within a system of state-led data monopoly. Through this discourse, surveillance is reframed as responsible administration, embedding biopolitical management within the operational logic of the society of control.

7.2.10.2 Text analysis

Confrontation

At the beginning of the confrontation stage, conflicts between epidemic control and individual privacy are identified. [1] Online events involving the exposure of personal data (names, phone numbers, and addresses) are presented to be part of efforts to trace close contacts. This also demonstrates how pandemic surveillance can slide into personal intrusion. [1.1] It acknowledges that those impacted experienced "considerable distress."

Opening

The opening shifts the orientation to institutional framing. [2] The Cyberspace Administration's Notice is an official solution that combines the protection of personal data with epidemic governance under state regulation. Technological control and privacy protection can coexist. [2.1] Via interviews with experts, it legitimises biosecuritisation as being a process scientifically managed and legally sanctioned rather than as a pure form of surveillance power.

Argumentation

[2] The grounds underlie the discussion in the Cybersecurity Law's classification of "personal data," which redirects focus away from mass collection and instead centres on how to handle it.

[2.1] The warrant then builds confirmed/suspected cases and close contacts as "high-risk," making intensified monitoring reasonable.

[2.2] The backing uses harm (harassment, discrimination) to justify exceptional handling.

[2.3] The claim elevates these data to "sensitive" status. On the surface, it establishes a sort of protection. Yet, it normalises the differential treatment of health identities and combines biopolitical sorting with legal status.

[3] The standard in this claim limits collectable nonconsensual data to those organisations authorised by health and cybersecurity regulations, with that law centralised within the state and competing forms of data collection disqualified.

[3.1] The qualifier provides a legal vent to escape, permitting future or new regulations to be made over consent and to retain elasticity for broader monitoring to conform to the logic of a society of control.

[4] The ban stated in this claim aims at unlicensed actors and the informal circulation, restraining doxing while centralising information power in official conduits.

[4.1] The backing places cybersecurity and police forces under the same constraints to address breaches, representing the same organisations as stewards of the main data, as well as agents of the flow of information. This is a configuration that constrains independent inquiry into biosecurity activities

[5] The grounds normalise the routine and collection at a large scale of monitoring local CDCs and communities.

[5.1] The balancing language in this claim reframes the problem as calibration instead, regarding efficiency as opposed to privacy, versus whether it should be interrogated at the level of the project, also in line with biopolitics, with population-oriented optimisation.

[6] The non-repurposing rule in this claim prevents function creep yet embraces the legitimacy of initial mass capture.

[6.1] The warrant's anonymisation legitimises population analytics, shifting the locus of control away from identifiable subjects and toward aggregated visibility.

[7] The life-cycle instructions in this grounds present a secure-by-design ideal (policies, audits, encryption) that technicises governance and repositions surveillance as neutral infrastructure.

[7.1] The purpose constraint in the warrant narrows stated targets.

[7.2] This qualifier establishes a temporal limit that can stretch under sustained "regular prevention," leading to sustainable biosecuritisation.

While a formal invitation to "qualified enterprises," the grounds ([8]) formalises their platform-state collaboration, including their incorporation of private infrastructures into epidemiological governance.

The backing ([8.1]) stresses speed and certainty, categorising continuous data capture as optimisation rather than political choice and marginalising the risks of corporate.

The rationale in the claim and grounds ([9-9.1]) indicates hotspot prediction and retrospective tracing centres population analytics as operative rationality legitimising continuous mobility mapping as the means for administering health at scale.

[10] The claim admits that epidemic big data analytics demand far-reaching personal tracking, and thus normalises surveillance by establishing it as an inevitable technical demand of public health management.

The qualifier ([10.1]) that "not all entities are qualified or authorised" is somewhat perfunctory, framing who can track, and not whether that's warranted. This re-entrenches an existing procedural hierarchy rather than challenging the activity and legitimacy.

[10.2] The warrant thus establishes legality as the criterion for acceptable surveillance, turning ethical and political debate into one of bureaucratic compliance. It presents state monitoring as legitimate and rational and translates political control into administrative order.

This rationalisation is solidified by the following backing ([10.3]) that data use must depend on informed consent. In the legal order, however, consent performs as a symbolic act, providing legitimacy to the large-scale datafication as responsible governance. These elements embed biosecuritisation in a technocratic logic, making surveillance a managed process that functions within the operational rationality of the society of control.

Conclusion

[11] Finally, the text concludes that only authorised institutions may use personal data for epidemic control. It presents state management as the sole legitimate form of surveillance. This final rule turns consent into a symbolic gesture while maintaining state monopoly over data, sustaining the hierarchical logic of biopolitical governance within the society of control. Citizen compliance is thus further reinforced through legal and technological normalisation.

7.2.10.3 Promotional strategy

The article's promotional strategy, relying on legal and technocratic rhetoric, attempts to legitimise surveillance as a responsible state practice. It describes mass data collection as a lawful act of governance, not coercion. The tone is calm, procedural, and expert-driven, which turns biosecuritisation into a reasonable means to efficiency and safety. Through focusing narrowly on "qualified institutions" and "scientific management," the text solicits compliance with surveillance as a type of care and protection. It hides the asymmetry of power between citizens and the state, embedding the logic of the society of control within everyday administration.

7.3 Rhetorical Features

Through investigating the texts via a PDA, the following rhetorical features in promoting the HCS are revealed.

7.3.1 Top-Down Mode in Government Communication and Less Care for Public Concerns

The Chinese government's communication style shows a straightforward top-down mode, which is a significant characteristic of the state's centralised control process. Since China is the most populous country in the world and has the world's third-largest land area, this vast population and extensive territory necessitate a unified, top-down central management strategy, which might be the only effective and necessary response for the central government to limit virus transmission. This management approach, mentioned in Chapter 4, is a cultural tradition of the CCP's leadership in dealing with historical crises, wars, and revolutions.

China's single-party system allows the central government to make decisions and implement policies immediately, while Marxism and Mao Zedong Thought provided an ideological background for the Party's centralised control activities. This mode enabled the central government to mobilise and coordinate resources swiftly across different regions. The HCS is

thus designed and employed for this type of management and control. Public concerns and individual freedom are often, inevitably, neglected in this type of management. Nevertheless, accustomed daily surveillance activities and less interest in individual rights among most Chinese citizens may have led to a relatively higher acceptance and tacit consent for the government to instruct them through an authoritarian approach. The top-down communication style left little room for public conversation or feedback, which ultimately resulted in mistrust and resistance among the population in the late stage of the state's extremely intensive pandemic control measures (Amnesty International, 2022).

7.3.2 Bureaucratic Rhetoric and Narrative Ambiguities

Bureaucratic rhetoric serves as a core mechanism in China's biosecuritisation narratives. Self-centred narrative, hierarchical command and centralised control are heavily represented in Xi's speeches. Xi is often positioned as the head of will, analysis and decision (the person who "deployed", "decided", "emphasised", "proposed" and "chaired"), while the Party-state apparatus materialises in the form of an executive chain that just "implements" and "carries out" those orders. This rhetorical pattern builds a vertical order of communication in which the centre thinks and decides, and the lower levels execute and report. This type of bureaucratic discourse stabilises Xi's central power, and offers nearly no room in the discourse for alternative imaginaries of rights, autonomy or pluralistic supervision.

Ambiguous technocratic formulations, such as "scientific prevention," ([6.2] in [G1-CN-Text 1] & [11] in [G1-CN-Text 2]), "precise management," ([17.1] in [G1-CN-Text 2]), "unified data standards," ([18.3] in [G3-CN-Text 4]), "principles of information-sharing activities," ([5.1] in [G3-CN-Text 5]), "supportive policies and regulations", ([5.2] in [G3-CN-Text 5]), and "other relevant legislation", ([2] in [G5-CN Text 10]), can create a feeling of objective, linking them with expert-driven solutions. In this way, bureaucratic language embeds biosecurity measures within a logic of optimisation and efficiency characteristic of the society of control.

7.2.3 Commanding Tone

China's corpus's PDA shows that texts about the implementation of the HCS have a strong commanding tone. The phrase "the green code is the passport for working, studying and living in the city" from [G3-CN-Text 5] frames the Health Code as a necessary tool of normal life; this frames its need to be urgently adopted by citizens. This is owing to the CCP's ideological underpinnings rooted in Marxism-Leninism and Mao Zedong Thought, which

imbue the role of the state with an obligation to guide and control societal life. Confucian values also predispose Chinese people to a propensity to acquiesce to authoritarian orders more readily than in cultures where personal liberty and self-determination are valued.

Previous experience of dealing with the 2003 SARS outbreak and some common sense to avoid SARS outbreak from being repeated (from the popular recall that heavy governmental interventions in controlling the virus, including travel restrictions and controlling the media, had been effective in the past) helped engender a society preparedness to embrace tough measures. Collectively, these historical events contributed to a consolidated memory that established an initial public trust regarding cooperating with the government's such measures when confronting the COVID-19 outbreak. So, the rationale for the commanding tone of the Chinese government is established from past cases and the historical experience and gained trust that the authorities reacted very strongly during previous outbreaks.

In conclusion, the authoritative tone of the HCS corpus reveals far more than mere stylistic preference, as it aligns itself with an ideological paradigm depicting centralised authority, a politico-communicative environment rooted in vertical command, a style of governance defined by a technocratic bureaucratic orientation, and a historical context that has tempered public faith in the rigid state-directed response. Most significantly, this interplay of authority, legitimacy, and memory produces a discursive space in which surveillance, datafication, and mobility restrictions are not framed as violations but as obligations. This, then, enables biosecuritisation to become intrinsic to the operational logic of the society of control.

Chapter Conclusion

The PDA of the Chinese corpus indicates that the above texts are implicated in building and stressing a specific type of governance. Throughout Xi's speeches and official discourse, the structure of argumentation is essentially set up in a vertical communicative form, dominated by the centre-dictating, population-compliant order. The authoritative discourse provides practically limited space for public discussion. The overall rhetoric normalises it as the only rational and patriotic way to govern a health crisis. It is this logic that is tightened by the language of bureaucracy and the command of tone.

Vague technocratic language makes policy seem precise while obscuring their concrete effects, generating cognitive distance that undermines the assessment of data usage and mobility control. At the same time, the HCS is itself designed as a "passport" for almost every aspect of normal life. It offers digital legibility, the prerequisite of social participation,

and grants people entry to normality in exchange for compliance. These rhetorical practices normalise biosecuritisation and digital surveillance as part of general governance that engraves a society of control logic in which political authority, datafication and population management combine and are largely unchallenged in official discourse.

Chapter 8 - UK CDA

8.1 Chapter Overview and Key Findings

Chapter 8 provides a critical analysis of official texts about the promotion and communication of biosecuritisation actions in the UK. It examines how these actions, including the implementation of the NCA, using data to manage lockdown, and the COVID-Pass, were disseminated and legitimised in the UK via government statements, expert commentary, and NHS promotional materials.

It explores the extent to which liberal ideology, legal principles, and cultural values influence UK pandemic communication, providing a basis for comparison with China's more centralised and authoritarian surveillance model. The chapter is divided into three stages according to a CDA format. Discourses are contextualised first, then interpreted to examine their functions and intended effects, and finally analysed to uncover the communication strategies used to present digital surveillance acceptable and routine.

Section 8.2 identifies the main discourses in the UK corpus: concern with privacy and security; liberal values like consent, proportionality, and parliamentary oversight; technocratic narratives that position pandemic governance as expert-led and data-driven; collectivistic and militarised rhetoric that promotes national unity and urgency; discourses of responsibility that individualise compliance as a civic duty; and the renaming of mass surveillance through words like "contact tracing" and "COVID-19 app," which shift attention from surveillance to public health protection.

Section 8.3 interprets these discourses through Hobb's framework, placing speaker intentions at its core and the forms of public knowledge they invoke. It interrogates how authority, consent, and responsibility are constructed within UK pandemic communication based on liberal-democratic traditions.

Section 8.4 analyses strategies to shift focus away from surveillance and onto technological utility and health benefits. These include naming practices, assertions that the app "tracks the virus, not people," and technical jargon like "Bluetooth" and "unique random IDs," that collectively help to normalise digital surveillance in everyday governance.

8.2 Overview of Discourses

8.2.1 Discourse Identification

This chapter introduces the discourses identified pertaining to the UK's use of digital contact tracing and pandemic surveillance in the context of the COVID-19 crisis. It lists the main themes highlighted by official texts involved with privacy and security concerns, liberal values, technocratic narratives, collectivistic trend and military-mobilisation, discourses of responsibility, and the strategy of renaming mass surveillance.

These discourses, in sum, provide a kind of pre-existing interpretation of UK political culture and the logic of governance, particularly when juxtaposed with the Chinese case.

Terms relevant to privacy, security, and anonymity are also high-frequency terms within the UK corpus and will be probed at first through word frequency analysis in the examination. In contrast to China's focus on "big data" as a control variable, the UK technocratic discourses tend to focus on privacy-preserving design features, such as "Bluetooth", "randomised IDs" and "data minimisation." These points hint at a mode of governance that approaches legitimacy through trust and consent with legal norms.

Liberal thought constitutes another central discourse. The references to consent, proportionality, parliamentary oversight and limited time emergency powers present surveillance as compatible with democratic ideals. Technocratic narratives, meanwhile depict pandemic management as an expert-led, data-driven exercise, redirecting the public attention away from political debate toward systems performance and optimisation.

In crisis rhetoric, there are some collectivistic appeals and somewhat mild militarisation elements, like in appeals for "protect the NHS" and praise for "frontline" workers. These encourage a sense of unity and urgency without abandoning liberal language. A discourse of responsibility is closely connected by suggesting that individuals ought, morally and practically, to do things that would allow themselves and others to be safe. Finally, changing the name of mass surveillance to "contact tracing" and "COVID-19 app" frames monitoring in terms of care, lessening resistance and normalising involvement.

Altogether, these discourses are important to explain how the UK state makes digital surveillance acceptable under a liberal-democratic structure. They unveil a mode of governance that presides over public health by persuasion, technical design, and moral obligation, while minimising coercion.

8.2.2 Identified Discourse Explanation

This part explains the identified discourses in detail. It provides a general overview of the discourses, explaining how they are represented in the texts, and primarily assesses the social-political contexts related to them before the evaluation process in Section 8.2.

1. Privacy and Security Concerns

High-frequency words related to privacy and data security reflect a socio-cultural tradition of establishing public trust when exercising mass surveillance. For pandemic control and disease surveillance, the risk of privacy violation is hard to avoid in the traditional process of data gathering. These data generally include location and personal information. As the biometrics commissioner argues in his statement on the use of symptom-tracking applications, this type of biometric technology is "a form of surveillance more normally associated with policing and could have a policing purpose" that ought to be regulated as same as police use of biometrics ([G5-UK Text 9], [1.2]). This is an irreconcilable conflict between keeping people safe from the virus and ensuring their privacy rights via digital solutions.

Indeed, the UK government were actively seeking a non-traditional surveillance mechanism to protect the users' privacy information with the latest technology, such as Bluetooth and randomly generated digital codes in each device. They have abandoned the centralised app v1 and developed the de-centralised app v2 which attached with a stronger DPIA in December 2020. Certainly, the final outcome of this contact tracing application was carefully developed under the law (GDPR and UK Data Protection Act 2018) that does not operate on a centralised database as China's HCS, and neither GPS location nor other personal data is accessed. Government speakers, therefore, can confidently claim the application can work without threatening the user's privacy for addressing relevant concerns.

Looking at the word frequency serves as a fundamental step in understanding the dominant themes and discourses within texts. Identifying the most frequently appearing words or phrases can give a clearer understanding of the key ideological strategies employed in each context. Word frequency analysis is a widely applied method for CDA that aims to efficiently identify discourses in the corpus. After taking a general overview of the corpus, several high-frequency words related to privacy protection and data security have been directly found in 38 places across the UK corpus (keywords: 19 times of *privacy*, 14 times of *anonymity/anonymous/anonymously*, 5 times of *data security)*.

7 of 10 texts (except [G1-UK-Text 1], [G1-UK-Text 2], and [G2-UK-Text 3]) contain these high-frequency words related to dealing with privacy and security issues, whereas the rest three texts are Johnson' speeches regarding lockdown ([G1-UK-Text 1 & 2]) and the instruction of the NHS COVID Pass ([G2-UK-Text 3]). In Johnson's two speeches, communicative attention is on crisis leadership, not data governance. Johnson talks about emergency action, sacrifice and national discipline. Yet rights and constraints on state power receive little attention. The NHS COVID Pass text operates in a similar way. It serves, instead, as an administrative guide, focused on eligibility and compliance without an explanation of how personal information is protected. What these absences reveal is a wider pattern: during emergencies, liberal rights talk retreats as the state asserts exceptional authority. They are also in stark contrast to the NCA-related samples. Promotion materials for the app emphasise privacy, anonymity, Bluetooth detection, and randomised IDs. These serve to comfort the public, as well as support voluntary uptake. Privacy is now a persuasive device instead of a firm boundary on data practices. This paradox in UK rhetoric indicates that privacy is brought to the fore when public cooperation is needed, but is less evident in contexts described as compulsory or urgent. In contrast, when it comes to the case of convincing people to use the NCA, a clear emphasis on privacy protection has been shown.

2. Liberal Values

Johnson's two speeches (G1-UK Text 1 & 2) take a crisis tone and emphasise national unity. They rely on the language of personal responsibility, avoiding any framing that indicates direct state coercion. He appeals constantly to voluntary compliance (with "stay at home," "protect the NHS"), and frames behavioural restrictions as a temporary sacrifice made by free citizens rather than prescriptions imposed upon passive subjects. He uses a moral language of civic responsibility to justify severe restraints on liberty and emergency controls. This language helps his policies align with liberal values that place consent and public participation in government ahead of authoritarian directives. The talk itself is about transparency and responsibility as well. The words underscore that limits must be lifted as soon as practicable, and that responsibility should be held to a standard of openness. This is a sign that powers of emergency must remain proportionate and reversible.

In [G5-UK Text 9], the biometrics commissioner suggests a neutral practice to address privacy concerns and the potential utility of COVID-19 symptom-tracking applications that should be regulated by Parliament. This approach raises consciousness of the dangers of surveillance growth and notes that support from the legislature is vital to prevent abuses of power. A good way of examining the ways he guides intrusive surveillance in a liberal society is to examine what strategies he makes for a mild solution that protects public health while still taking into account individual rights.

The fundamental question that arises from this statement is: Is the public interest worth an invasion of an individual's rights regarding his privacy? He therefore thinks that the decision-making and implementation of the law within parliament in this case should be as the process for the police use of biometric information in the PoFA 2020. That is a clear demonstration of his official position in ensuring human rights through democratic means. He proposes that the public interest test could possibly be justifiable by virtue of a limitation on duration, which is related to liberal thought.

Respecting liberal values is essential when starting a nationwide surveillance of a pandemic to protect the rights of individuals and uphold democratic norms, which is ensured by citizens becoming participants. Liberal values such as independence or privacy of an individual guide us to an ethical system on which to base our governance. In the context of prevention and control efforts against epidemics, liberal values are rooted in recognition that every citizen deserves to decide whether or not to participate in surveillance activities if they so desire.

The history of events including the *Magna Carta* made clear that no one in this country (including the state itself) is above the law. By providing a historical context, *Magna Carta* reminds us that governance and decision-making should always be guided by basic principles for the pursuit of rights and freedoms. The Coronavirus Act 2020 demonstrates this tradition by being derived from the traditional legal principle and being implemented in the context of a health emergency [G5-UK Text 9], [3.4].

3. Technocratic Narratives

Technocratic narratives are repeated frequently throughout the UK corpus. Government narratives depict the pandemic as a technological, information-based issue. This framing positions health governance as an expert-led exercise, unlike a political one. For instance, Johnson repeatedly refers to infection data as the basis for decision-making involved with lockdowns in [G1-UK Text 1 & 2]. Chief Executive of NHSX said that "technology can help us get the country back on its feet" and believes it is the solution to reduce virus transmission while protecting themselves, the people they care about and the NHS ([G3-UK-Text 4], [10.1-10.2]).

Technocracy is further intensified in NCA-related samples ([G2-UK Text 4, 5, 6, 8, 10]). These samples narrate that the crisis can be under control through Bluetooth functions, randomised identifiers and risk-scoring algorithms. The critical questions now thus turn to focusing on accuracy, interoperability and system updates. Operational concerns about digital monitoring outweigh ethical concerns, as if the legitimacy of large-scale data collection were already settled and only the optimisation of its mechanisms remained. Technical reliability becomes the dominant metric of success, while questions about rights, accountability and the long-term role of digital surveillance are displaced from public view.

Privacy is considered design work as well. In [G2-UK Text 4 & 5], the mentions of Data Protection Act, anonymisation and security testing suggest privacy is something to be designed into the tool and that the degree of protection involved is something that can only be achieved by technical sophistication. This framing draws attention away from wider debates about whether mass data collection should even begin and toward how compliance may be achieved, moving from large-scale practices to data collection and a need for rules to be defined and enforced. It narrows the conversation down to system architecture and so obfuscates the political choices that are involved in constructing a national contact-tracing

regime. The emphasis, in this way, is able to shift potential wider debates about surveillance to technical compliance.

The Biometrics Commissioner in [G5-UK Text 9] uses a similar style. He discusses symptom-tracking apps through regulatory tests, time limits and statutory review, showing a preference for procedural oversight instead of deeper scrutiny. There is little detail on issues like necessity and the cumulative expansion of health-related surveillance. The commissioner instead calls for using surveillance responsibly, which normalises the idea that digital monitoring will continue as long as procedural controls exist. Oversight is referred to as overseeing particular types of data use, not questioning their sustained role in the long run.

Tech companies like Apple and Google are apparently indifferent utility providers of infrastructure. They appear neutral as to whose role they are perceived as the provider of infrastructure is not political on this score. Their role is presented through interoperability and technical support, giving the impression of a purely utilitarian and neutral service function. The politics of platform power, or the political economy of platform power, and the power that these firms exert through standards, architectures and data governance of power, is neglected. Their involvement is naturalised as a logistical task and, as such, it makes it harder to consider more expansively just how emergency infrastructures intensify dependencies on corporate systems.

4. Collectivistic Trend and Military-mobilisation

Another important point is that a strong collectivistic and bureaucratic ideology is demonstrated when the government speaker announces the start of the test and trace programme. In some circumstances, militarised discursive practice also emerges. These are indicative of a relationship between collectivistic tendencies and the UK government's mass-surveillance campaign. Militarisation is the infusion of civilian governance with military vocabulary or organisational logic, such as hierarchy, command-and-control, discipline, and coordinated mobilisation. When deploying the Test and Trace programme, militarised language is used as a means of urgency and to elicit collective action.

In the UK corpus, this discourse is most explicit in Boris Johnson's speeches in [G1-UK Text 1] and [G1-UK Text 2]. These include softly nudging the public to get vaccinated ([G1-UK Text 1], [1.1]), describing health workers on the "frontline" ([G1-UK Text 2], [9.1]), and advocating a collective effort ([G1-UK Text 2], [1.4 & 3.1]). Collectivistic themes also appear in the Test and Trace announcements in [G2-UK Text 4] and [G2-UK Text 5] as

citizens are invited to "protect the NHS" ([G2-UK Text 4], [19.1 & 21.2]). This is the type of language that binds personal action together, as part of a broader national undertaking. This rhetorical strategy shrinks the area for questioning these surveillance practices, to be shamed as a failure of the collective.

5. Discourses of Responsibility

In the UK corpus, responsibility is commonly individualised as articulated and presented in liberal-democratic vocabulary. For instance, in Johnson's two speeches, he consistently advocates that citizens should protect themselves and others by reducing social behaviours. In [G3-UK-Text 4], Isle of Wight MP Bob Seely said: "We have a moral duty to protect life now, but we also need to protect life in future." It is these appeals which represent compliance in the pandemic as a voluntary moral act performed by autonomous citizens instead of obedience to state authority.

The communication of the Test and Trace project repeats that framing. Responsibility is expressed as a voluntary yet collective effort when self-isolating or when using the NCA. This discourse frames risk management as a communal social obligation that is shared with millions of individual decisions. It also relocates the pandemic control responsibility from the central state to the everyday moral conduct of people. In so doing, it strengthens the liberal ideal of some self-governing public whose responsible conduct is the basis of national resilience. Institutional responsibility is also put front and centre. The Biometrics Commissioner argues that Parliament has to examine any growing digital monitoring to determine that surveillance practices are "necessary, proportionate and time-limited". That brings the communication to a constitutional context of accountability; the very requirement of democratic oversight becomes a protection for the normalisation of intrusive technologies. Responsibility, within this perspective of understanding, is distributed to both the citizens and political institutions responsible for defending rights and the legal process.

6. Renaming Mass Surveillance

An interesting promotional strategy has been found in the corpus, which is renaming digital surveillance as a "contact tracing" tool that shifts the object of surveillance from individuals to the coronavirus. It indicates a subtle disruption of attention in discourses that disintegrates the pandemic transmission from human social interaction. Because the only object for contact tracing ought to be the human individual in a general sense. In other words, this is a type of

sophistry that draws the public's attention. It takes virus transmission apart from human activities and leads them to feel like they are not the objects under surveillance.

Naming the surveillance tool as "contact tracing" or a "COVID-19 app" can create a perception of the tool tracking and controlling the spread of the virus. The attention is therefore shifted from a mass surveillance programme to a tool for bringing public health benefits that can deflect the concern related to intrusive aspects of biometric surveillance.

8.3 Discourse Interpretation

After identifying key discourses in the UK corpus, the next section evaluates the identified discourses by using Hobb's framework.

8.3.1 Evaluation of Discourses

1. Privacy and Security Concerns

Evaluation

Through an emphasis on "privacy, security, and anonymity" across the texts, a strategic use of language in the service of the NCA's perception and trust can be detected. Instead of treating privacy as a contentious political issue, the texts embrace it as an already solved design aspect of the app. These keywords act to protect the user from distrust and position a mass data-collection system as a protective mechanism for the individual.

The discourse frames privacy as a fundamental element of the app's credibility, deploying keywords ("security," "anonymity") as part of a convincing narrative about it being a credible weapon against COVID-19. Such a narrative is designed to instill confidence amongst potential users about its features whilst also providing them a compelling reason to download it since it depicts how they maintain their privacy on a personal level.

Such word frequency serves as an indication of responsible data governance, providing a stringent moral benchmark for digital intervention. The regular use of privacy talk gets to a potential user concern, which tells you the trustworthiness of an application is well established and assures users that their data will not be mishandled.

Knowledge Representation

The official speakers/writers seem highly aware of the public's cultural aversion to intrusive surveillance, which may lead them to associate the upcoming disease surveillance tools with

George Orwell's "Big Brother" description. They strategically addressed these concerns by frequently emphasising privacy protection. Such relevant keywords are meant to create a narrative that distinguishes the application from an intrusive Orwellian surveillance system.

Surveillance in the UK has a negative past that's been written into the collective consciousness. Memories of extensive state surveillance during the Cold War as well as more recent controversies around mass data collection, including but not limited to the Investigatory Powers Act 2016, have created distrust among the British public. The impact of the GDPR on the UK's data protection policies has also raised concerns about privacy protection regulations. Following Brexit, the UK has retained the GDPR framework that imposes strict requirements on the collection and processing of personal data. Embracing surveillance-related terminology may clash with these data protection rules, leading to legal challenges and loss of public trust. Indeed, the government's decision to repeatedly include many terms related to privacy and security can therefore be considered a result of multiple factors: the collective memory of past mass surveillance practices and GDPR principles.

2. Liberal Values

Evaluation

First of all, the statement of the biometrics commissioner is presented as a defence of liberal-democratic norms, but its tone is more managerial than oppositional. It treats surveillance as acceptable so long as it is proportionate and time-limited, and it reduces oversight to a technical procedure, excluding the possibility of a broader democratic argument about the legitimacy of such measures. The use of parliamentary procedure and statutory review seems neutral, to the extent that its neutrality perpetuates an important liberal fiction that surveillance can be exceptional and still controllable under legal guarantees alone. This mirrors the logic of Foucauldian governmentality, in which freedom is controlled indirectly via regulation without directed coercion.

He foregrounds the public interest test and the need for a legislative basis for symptom-tracking apps. At the same time, this discursive step stabilises surveillance by reclassifying it as an exercise of reason and management. The use of liberal language makes intrusive data practices legally permissible, and hence prolongs what Foucault would call biopolitical management: life is reordered, through information, scoring of risks and monitoring the population.

Secondly, in Johnson's two speeches, he appeals to citizens in a pleading tone, asking people to reduce social activities by listing infection data and achieved collective efforts, locating responsibility within autonomous individuals without the coercive power of the state. Limits are called temporary measures that individuals willingly take. This turns obedience into a form of moral performance which covers discipline in the form of voluntary self-regulation, an enduring technique of liberal governmentality.

Knowledge Representation

These aspects of the audience would greatly impact the statement, such as the audience's previous perspectives on surveillance, privacy, and government action. These attitudes influence how the article will be seen by them and inform the way biometrics is used in the era of pandemic control.

The GDPR stipulates that data processing must be necessary and limit data collection to a minimum amount to meet a specified threshold. It also demands that people understand why and how data is taken. Article 8 of the *Human Rights Act 1998* protects individuals' rights to respect for privacy and privacy of the family and data. Moreover, the Regulation of *Investigatory Powers Act 2000* is an important regulation to keep checks on government monitoring and investigation, as well as limiting the ability of the government to monitor and gather the information it collects. This covers requiring the government to actively solicit public feedback when new products are being developed and put into effect, and publish regular transparency briefings explaining how data is collected, processed and the information used.

The cautious policy is exemplified in [G3-UK-Text 7], which contains app updates, explains the features of the system to provide anonymity and repeatedly emphasises that no personal information will be shared with the government, the police or the NHS. It was also influenced, in part, by the legal and cultural tradition of the UK. Constitutional conventions, from *Magna Carta* to the *Bill of Rights*, created boundaries on state power and left us with a generational expectation that individual rights needed to be safeguarded. Subsequent political and social changes set up a cultural milieu that emphasises personal liberty. These historical foundations enabled the government to rationalise COVID-19 measures only within a legal framework that would aim to check state overreach, placing rights-protection as the defining condition of pandemic intervention.

Readers learn about biometrics and policing, along with their changing cousin mass-surveillance technologies, in the biometrics commissioner's comment in their biometrics statement. The references to existing law in particular to the *Protection of Freedoms Act 2012* and the *Coronavirus Act 2020* provide a way of "shaping" what people know and can become aware of that powers are regulated. This discussion mirrors the UK's legal and political history, in its legislation from parliamentary oversight to limits placed on emergency provisions. Such themes are found in the commissioner emphasising the power of Parliament in decisions with respect to the powers to intervene, the temporary nature of the powers which are "applicable" to powers beyond Parliament and the need to get involved with and consulted with government and regulators. The statement also gestures at wider social fears within Britain, where rapid technological advances carry concerns about civil liberties. It places pandemic surveillance in a legal culture that expects justification, time constraints and democratic watchfulness.

3. Technocratic Narratives

Evaluation

Technocratic narratives in the UK corpus present the pandemic first and foremost as a data and systems problem. As Johnson's speeches [G1-UK Text 1 and 2] repeatedly attest, the decisions to lockdown are based on science and daily statistics. Infection curves, hospital capacity, and R numbers are the main reasons for acting. Political judgment is shown yet is framed as the correct translation of expert advice. This gives epidemiological data a dominant authority within the argument.

In NCA-related texts ([G2-UK Text 4, 5, 6, 7, 8, 10]), technocracy makes itself even more evident. The crisis is reported to be manageable if employing Bluetooth proximity detection, random identifiers, and algorithmic risk scores. The core questions change to accuracy, interoperability, false positives, and software updates. Ethical and political issues are pushed to the background. The texts proceed as if the parameters of digital monitoring are already fixed, requiring only refinements in implementation.

Privacy is wrapped in this same logic. For example, in [G2-UK Text 4 & 5], compliance with the Data Protection Act, anonymisation and "rigorous testing" are treated as elements of the design. The app is discussed as though privacy and rights can be solved through design choices alone. It shifts the point of potential debate from "should the state be concerned with collecting and processing this information at all?" to "has the team applied minimisation and

encryption properly?". This reduces the potential for public debate and transforms a constitutional question into a technical one.

The Biometrics Commissioner employs a similar communication style, and as seen in the above evaluation of liberal values, he assesses upcoming symptom-tracking apps in terms of tests of necessity, proportionality, and time limits. Procedural oversight, statutory review and sunset clauses dominate the discussion. There is little sustained discussion of the cumulative expansion of health-related surveillance, or the potential for normalising such tools to shift the baseline of acceptable control. Surveillance is accepted only when it is packaged in the right processes.

Big tech firms are written in the same technocratic mood. Apple and Google are characterised as providers of an exposure-notification framework, necessary for Bluetooth functionality and cross-device operation ([G2-UK Text 4, 6]). Their role is portrayed as technical and instrumental. There are no issues about platform power, long-term data infrastructures or reliance on private standards. This presentation reduces corporate involvement to a matter of neutrality, of inevitability.

From a critical view, we can see how these narratives are in good consonance with Foucault's biopolitics. Population-level health is governed by measures and continuous observation, and life is managed by statistical knowledge (Foucault, 2008). They are also consistent with governmentality in a liberal state where power is exercised through expert systems, standards and guidance documents that invite subjects to obey them "freely", instead of through coercion. Although this dynamic is clear, the persistent emphasis on codes, updates and data flows stands out. It aligns with Deleuze's idea of a society of control. In this model, flexible, information-driven modulation replaces older, fixed forms of discipline.

This evaluation of technocratic discourse in the UK corpus thus suggests a political strategy of extending digital control while positioning this as a scientific necessity and administrative common sense.

Knowledge Representation

Technocratic narratives create a certain way of understanding the pandemic and of conceptualising the relationship between state, citizen and technology. First, they place data and digital systems as the most trustworthy way of perceiving reality. Infection numbers and risk scores, and app notifications are presented more authoritative than the mundane. In this

order of knowledge, the "truth" of risk is produced by algorithms and dashboards, while human judgment is most prized for advancing what the data already say.

Second, at the heart of those narratives sit what are deemed neutral and benevolent portrayals of technology. In the NCA-related corpus, the app is presented as a method to help keep people safe by alerting them to exposure events. It is claimed that the Bluetooth architecture is privacy-preserving by design; in place of names and phone numbers stand randomised IDs. The tools come across as rational mechanisms that would enable the UK to live with the virus while keeping freedom intact. The intrusive process of continuous proximity logging is displaced by the narrative that the app does not know who you are or where you are ([G3-UK-Text 6], [3.4]).

Third, technocratic discourse reshapes the way authority is conceptualised. Expert committees, data scientists, NHSX, and technology partners hold the decision-making authority. Parliament appears at the level of framework law and review ([G5-UK Text 9]), while the day-to-day definition of risk thresholds, algorithmic parameters and notification rules belongs with technical bodies. This is consistent with a governmentality approach in which rule is performed at a distance via standards and procedures.

Fourth, the subject of governance in this discourse is a datafied person subsumed within a large number of datafied subjects. The individual is a node in a contact network, represented in terms of changeable risk categories. Biopolitics works based on these categories of high risk, low risk, self-isolate and release. The NCA and the Test and Trace system, together, perform a repeated sorting of bodies in space and time. This is, Deleuze observes, a site of control, one founded on codes and access permissions, not on fixed enclosures.

Lastly, this representation of knowledge has a clear ideological impact. It makes this digital surveillance seem like the rational management of life in accord with liberal principles of care and responsibility. Given this emphasis on design, encryption and proportionality tests to evaluate the effectiveness of such measurements, the larger question of whether permanent infrastructures for population-level monitoring are justified at all should therefore be pushed to the margin. If it is a transparent, secure and time-limited system, that is fine. In practice, these narratives situate a trajectory wherein app-based tracking, data integration and platform infrastructures become mundane elements of governance for public health. UK technocratic discourse does not merely describe tools. It entrenches a biopolitical and control-based form of governance that is difficult to dislodge once the emergency passes.

4. Collectivistic Trend and Military-mobilisation

Evaluation

The collectivistic and military-tinged language in the UK corpus attempts to balance two conflicting pressures: 1) the necessity of coordinated population management, and 2) the requirement that citizens should remain free. However, in Johnson's speeches, appeals to "protect the NHS," praise for "frontline" workers, and calls for united national action [G1-UK Text 1 & 2] do more than encourage solidarity. They frame compliance with restrictions as part of a collective moral obligation. Once participation is framed this way, hesitation can thus be described as a failure of civic duty rather than a legitimate fear about surveillance or being intervened into by the state.

The phrase "protect yourself and your loved ones" continues the same logic. For instance, citizens are instructed to do so in [G4-UK Text 8], [2.2]. This transforms the self-consistent take-up of the app and compliance with the isolation laws into a citizenship responsibility. These actions are positioned as part of a national initiative, not as duties imposed by the state. This reroutes the onus of responsibility: people are now beginning to manage their own behaviour on the surface as a contribution to the public good rather than being pushed against it.

This dynamic is also compounded by the militarised register. Referring to NHS staff on the "frontline" ([G1-UK-Text 1], [9.1]) or framing the pandemic as something to "fight" ([G1-UK-Text 1], [2.6]; [G1-UK-Text 2], [1.2]), and "each and every one of us is directly enlisted" ([G1-UK-Text 2], [9.2]) infuses a strong awareness of urgency, discipline and a sense of togetherness in public health messaging. Now, within this wartime terminology of war, questions about digital surveillance are made more difficult to formulate, but they are also harder or more difficult to express and less easy indeed to frame without looking subversive or disloyal. The tone, while softer than the Chinese corpus but more permissive, is not one of absolute powerlessness. It is a narrowing of the discursive landscape for contesting surveillance practices.

When viewed from a governmentality standpoint, such stories will encourage citizens to internalise and manage themselves for state purposes. Digital monitoring is perceived as a normal part of collective action and not an exceptional event that demands public defence. Thus, the communicative space gives participants in biosecuritised actions a sense that their

inclusion in this experience is anticipated, a requirement, and challenging enough without gaining moral condemnation.

Knowledge Representation

The potential impact of militarisation on the linguistic perception of the UK audience is multifaceted, with potential implications for how the public perceives and responds to public health measures, particularly in the context of the COVID-19 app. The use of militarised language introduces a collective and organised framework that may sound contradictory to the UK's predominantly individualistic culture.

The UK has a tradition of individualism. Personal autonomy and freedoms are highly valued and respected in general. Within this cultural context, emphasising collective duty and employing militarised metaphors may appear unnatural. Given this cultural context, emphasising collective duty and militarised metaphors could be seen as unnatural. In the UK, where social customs tend to favour individual choices and liberties over the shared value of shared responsibility, this "War and armies" language may raise concerns of authoritarianism or command and control.

The way the COVID-19 response is presented as a sort of "military campaign" raises the issue of collectivist norms and culture (this seems to be a contradiction to the more individualist focus of the UK). While collective actions should be paiszed in times of crisis, the use of a metaphoric war narrative can be seen as a violation of the usual rhetorical emphasis on individual freedoms and agency. In a society that places high value on personal rights and freedom of choice, a change in language toward more collective terms may lead to a subtle and complex reaction. The way that the audience perceive a militaristic statement could differ; some may see it as a well-deserved plea to do collective work in times of necessity whereas others might fear a degree of government regulation and relinquishing personal liberty.

5. Discourses of Responsibility

Evaluation

The UK corpus presents responsibility mostly as a burden that one must bear. In his speeches, Johnson tells people that they have a duty to "stay at home," "save lives," and "protect the NHS" ([G1-UK Text 1], [2.6]; [G1-UK Text 2], [3.6]). These appeals paint compliance as a moral decision made by free citizens. Restrictions become temporary acts of civic

responsibility instead of expressions of state power. This softens the force of legally binding rules and inspires people to view their own behaviour as central in pandemic control.

Self-isolating, or using the contact tracing app, is called helping to protect others ([G2-UK Text 4], [19.1], [21.2]; [G2-UK Text 5], [7.2], [25.1]). Responsibility is therefore spread across a series of small decisions. In some sense, it is a neoliberal type of governmentality, through which the people are left alone to self-determine how it is controlled in accordance with public health rules and regulations, which reduces the direct enforcement of the rule.

Generally, responsibility discourse does a good job of stabilising pandemic governance. Citizens are told to take public health goals seriously as their own obligations, and institutions are characterised as neutral protectors who keep surveillance within limits. This is how intrusive policy has the illusion of being able to be accommodated in a liberal-democratic regime.

Knowledge Representation

The discourse of responsibility depicts the public as a self-governing population. Citizens seem like rational agents who can be trusted to interpret guidance and discipline themselves. In [G1-UK Text 1] and [G1-UK Text 2], Johnson's repeated second-person address ("you", "your") positions pandemic control as a matter of personal ethics and self-management. This constructs a civic subject who internalises state priorities and who views compliance as evidence of good character. It also shifts attention away from coercive capacities that remain in the background. The corpus also embodies governance as a form of procedural legitimacy. Institutional knowledge is expressed through tests, criteria, and time limits. The Biometrics Commissioner's focus presents legality as the main language of caution. The implicit common sense is that surveillance is acceptable when it passes the proper checks.

In this sense, Responsibility is likewise attached to knowledge about life and risk in a biopolitical context. The public can then be thought of as a transmission field to be regulated by action. This form of knowledge model, which operates as a distributed duty, normalises population management. Every person becomes a small node of risk mitigation. Freedom of movement remains unchanged at a more formal level, but is constantly guided by alerts set off by proximity. This also parallels society-of-control dynamics. Power looks more like continuing modulation, unlike visible prohibition. Individuals are steered through exposure notifications and regulations demanding constant recalibration. Discourse about responsibility thus makes it non-political.

6. Renaming Mass Surveillance

Evaluation

Government communication carefully crafts language in promoting the NCA by manipulating its language to ensure the political sensitivity of surveillance is appropriately contained. There are some words like "contact tracing" and "COVID-19 app" that address the virus transmission and the delivery of public health. The passive target of surveillance is the virus and not the people ([G3-UK-Text 5], [3.3]; [G3-UK-Text 7], [3.2]; [G4-UK Text 8], [4.4]). This wording makes digital tracking appear routine and administrative, closer to healthcare management than to population surveillance.

Voluntariness is central to this strategy. App usage is consistently framed as a decision made for the benefit of others (G2-UK Text 4; G2-UK Text 5). This accords with liberal-democratic principles of consent and free choice. It redistributes responsibility, however, in the same process. Participation and the risks of nonparticipation are presented as an exercise in human judgment. In this manner, the state presents itself as facilitating responsible action, not as an agent of coercion.

Language of privacy plays a similar role. Across the corpus, it is found that repetitive references to anonymity, data minimisation and limited retention create the image of a system that monitors without intruding. Privacy becomes a persuasive resource that encourages users to accept and take part in monitoring practices. This focus can distract from wider political inquiry into how monitoring infrastructures persist after their introduction.

Limited data storage and lack of personal identifiers in the report are reasons that have been given to dampen the fear of permanence ([G3-UK-Text 7]). However, from the pragmatic view of governance effects, these assurances remain meaningless. Everyday behaviour is still influenced by regular exposure alerts determined by proximity. Control activities thereby work through guidance and self-regulation, which fairly aligns with theories of governmentality and the society of control. Behaviour is shaped through continuous information flows, as people adjust their actions in response to instructions and feedback. Power, therefore, operates through ongoing communication, while direct command is invisible.

Knowledge Representation

Through scrutiny of the UK corpus, overt surveillance terms do not appear in any of the UK government speakers and writers' promotional language for the contact tracing app. Yet, this restraint is not merely a matter of style. It is a form of anticipatory communication that treats public suspicion as a governance problem to be managed. The corpus implies an assumed audience associating surveillance with rights issues and state overreach. This knowledge is activated by avoidance that the less the app is called "monitoring" or something else similar, the easier it is to present it as standard public health practice.

As in general, there is a robust public memory through surveillance infrastructures and conflicts in society of the UK (which includes the daily deployment of CCTV cameras as well as ongoing political discussions about violations of privacy). Such histories generate a common-sense expectation that monitoring should take the form of justification, limits, and clear accountability. Therefore, both speakers and writers considered privacy sensitivity as natural and normal. Promotional language, therefore, stresses voluntariness and technical privacy features. The app is introduced as compatible with liberal values that prioritise consent and personal choice.

This conversation also suggests that resistance is most likely to occur when surveillance is referred to by its name. If promotional messaging deployed explicit vocabulary for monitoring, it could provoke objections that go beyond technical matters and into questions about state power. It suggests that disagreement has a cost, because people will only take part if they trust the system. Hence, the language tries to keep the app within a liberal register. It becomes a resource for assistance, for knowledge, for security. Surveillance is not removed. Instead, it is reframed as administrative care and hazard identification, which reduces the political visibility of population monitoring.

The contrast with the Chinese corpus is instructive, but the UK experience should not be read as merely "less controlling." The discursive strategy subverts control to gentler forms. It fosters self-regulation through guidance and moral obligation. In that framework of knowledge, citizens may be thought of as autonomous agents who make their own decisions, even if they are motivated by social obligations and the demands of a crisis. This is consistent with a governmentality logic; power not only operates at a point of enforcement but also through the way people think about good behaviour.

8.4 Attention Shift for Avoiding Mass Surveillance Characteristics

In the NCA's contact tracing mechanisms, it also shares similarities with biometric surveillance, especially in terms of monitoring individuals' movements and interactions. The requirement for individuals to self-isolate when receiving a positive result further shows the application's function in behavioural control. However, the government writers/speakers seem to position the app as a necessary and ethically designed tool in fighting against the pandemic. Therefore, they carefully frame it as a means to protect public health while reducing potential fears of overexpanded surveillance.

A major persuasive strategy used by the speakers/writers over the corpus is to emphasise how privacy can be protected by the latest data security technology when announcing the rollout of the app. This is due to an anticipation of the public's concern for privacy and human rights. Chapter 4 has explained that the cultural-historical context in the UK has a traditional fear of "Big Brother". In practice, any form of human-oriented surveillance is difficult to justify as a non-harmful tool for bringing public benefits without sacrificing a certain degree of private interests. The speakers/writers' attitudes and stances certainly belong to the side of the UK government. Thus, all they aim to do is to provide an appropriate reason for launching a mass surveillance programme by reducing the natural characteristics of surveillance.

Unlike China, the UK did not experience similar feudal despotism and a centralised authoritarian system until the last century. Instead, through the Industrial Revolution and a series of political reforms, the sense of respect for individual rights gradually formed, becoming a mainstream shared value in British society. Consequently, the government's strategy in promoting public health measures arises from this cultural background. Additionally, as a democratic country, the British government's decisions and implementations often require broad public support and trust. Direct mandatory measures could lead to public distrust in the government, weakening its ability to enforce other public health measures. By emphasising the app's benefits and privacy protection, and appropriately diverting attention, the government can gradually gain public trust and support, promoting voluntary use.

8.4.1 The Strategy of Renaming Digital Surveillance

Renaming digital surveillance as "symptom tracking" ([G5-UK Text 9], [1]) "test and trace" ([G3-UK-Text 4]; [G3-UK-Text 5]; [G3-UK-Text 7], and [G4-UK Text 8]), and "contact tracing" ([G3-UK-Text 4]; [G3-UK-Text 5]; [G3-UK-Text 7]; [G4-UK Text 8]; [G5-UK Text

9]; and [G5-UK Text 10]) is a simple technique to promote the government's surveillance project that appears in each text. How people and things are named and described in texts reflects power relations, value judgments, and ideological power.

For discourse analysis, a typical example is the "Us" vs "Them" dichotomy. It refers to the speaker/writer including or excluding a certain type of people from a category so the audience's view of these individuals can be shaped (Reisigl and Wodak, 2001, p. 46). This type of linguistic representation is referred to *exclusion from* or *inclusion in.* Reisigl and Wodak (2001, p. 47) conclude that it serves "many psychological, social or political purposes or interests on the side of the speakers or writers," which strategically conceals individuals responsible for discriminatory activities.

The same linguistic strategy works in the case of promoting mass surveillance as well as shaping people's views on a certain group of people by including or excluding them from an entity. For instance, the so-called "generic masculine" in the German language also linguistically includes women which has been argued by feminists as *people* and *they* (Reisigl and Wodak, 2001, p. 47; Silveira, 1980, p. 165). The UK government renamed the mass surveillance tool to obscure the invasive nature of these measures.

This renaming strategy is frequently applied by authoritarian regimes to repack state actions, making them appear less intrusive and more acceptable. For example, China's policy of "re-education camps" in the Xinjiang Uyghur Autonomous Region, where facilities akin to concentration camps are termed "vocational skills education training centres" to ostensibly help Islamic minorities like Uyghurs gain employment skills and prevent extremism. However, substantial evidence indicates these camps are used for mass detention, brainwashing, cultural assimilation, and forced labour, accompanied by extensive surveillance and restricted freedoms (Raza, 2019).

Another extreme example can be the term "final solution" (Endlösung der europäischen Judenfrage) used by the Nazi regime for euphemistically labelling the holocaust of Jews to cover its atrocious nature (Friedlander, 1995, p. 284). This approach justifies these actions as positive functions that can help tackle specific issues, while the sinister nature is subtly concealed. During the COVID-19 crisis, this strategy is used to exclude the contact and symptom tracing programme from biometric and digital surveillance, making the audience think it is acceptable as a beneficial tool for staying away from the virus.

8.4.1.1 "It tracks the virus, not people"

One single statement (shown in the text box below), which justifies the contact tracing app does not have the characteristics of a general form of surveillance, wholly or partly, repeatedly appears in five texts (out of 10).

'The app has been designed with user privacy in mind, so it tracks the virus, not people and uses the latest in data security technology to protect privacy. The system generates a random ID for an individual's device, which can be exchanged between devices via Bluetooth (not GPS). These unique random IDs regenerate frequently to add an extra layer of security and preserve anonymity.

The app does not hold personal information such as your name, address or date of birth, and only requires the first half of your postcode to ensure local outbreaks can be managed. No personal data is shared with the government or the NHS.'

([G3-UK-Text 4]; [G3-UK-Text 5]; [G3-UK-Text 7]; [G4-UK Text 8]; [G5-UK Text 10])

This statement emphasises the idea of tracking the virus rather than people, which originally comes from a statement titled *NHS COVID-19 app* about the launch of the contact tracing app by NHS England on 1 July 2020 (NHS England, 2020). The declarative structure of it, in brief, explains the technological mechanism of how the user's private data is protected and states clearly that the government or the NHS cannot obtain any personal data while using.

Quoting a unified official statement in such circumstances helps to establish a public trust because the statement is assumed to be properly edited by the government and institution for clearly convey the idea that the user's privacy can be well protected, and it does not track individuals.

This statement cunningly employs a discursive strategy that not only shifts the emphasis from tracking individuals to tracking the virus but also introduces a conspicuous logical incongruity. The assertion that the app is developed with user privacy in mind, tracking the virus rather than individuals, is not only scientifically inaccurate but reveals a deliberate attempt to mislead. It steers attention away from the actual tracking of individuals. This wording intends to shift the audience's attention, yet does not withstand basic logical scrutiny. The virus needs in-vivo transmission. It cannot be transmitted interpersonally without the human body. The statement contends that the app refrains from retaining personal information, ostensibly enhancing a commitment to privacy. However, the persistent tracking of interactions and proximity contradicts this claim, showing a calculated misdirection aimed at concealing the app's fundamental functionality.

In scrutinising the discursive manoeuvres, one must recognise the deployment of rhetoric to create an illusion of prioritising public interest through privacy measures. This narrative construction is not only misleading but also operates as a calculated attempt to relieve public concerns and create a positive perception of the app's functionalities. By misleading the app by focusing on tracking the virus rather than individuals, the government seeks to gain public support and cooperation. This is essential for its effectiveness in controlling the pandemic.

8.4.2 The Manifestation of a Control Society and Governmentality

The app's promotional language and naming practices represent a unique logic of control society, and governmentality in UK pandemic communication. It diverts the discussion away from surveillance as a political act toward surveillance as a routine public health administration. This shift is important because it normalises civic-minded monitoring and presents it as a shared social responsibility, not as an act of coercion. Within the framework I have discussed in Chapters 3 and 4, this manifestation suggests that individuals are both targets of and participants in their own surveillance. They are treated as subjects of choice, free subjects who make meaningful choices, yet they are moulded by continuous prompts, moral nudges, and pragmatic incentives that implicate safety in a day-to-day process of daily life.

Therefore, a more fluid form of power is created through gently "nudging" individuals to monitor each other anonymously rather than exercising force. This is a softer form of power. It operates with self-regulation through anonymous alerts and risk notifications. The app thus allows control that works by modulation and continues, not only with acts of discipline. Behaviour is modified by ongoing signals and feedback. It conforms to a society-of-control logic, as safety and normality, and hence, access to it becomes associated with adherence to a system of data-driven security.

The NCA is framed as a form of protection, but also expands the reach of the state to control population movement and contact at scale. It is a confusion of care and control in one device. Voluntariness is key to the rhetoric, yet it is also a legitimacy device. Consent is presented as the moral imperative of participation, for however socially coercive and duty-bound participation is, even when it is couched in relation to other social demands.

Overall, the UK pandemic communication, more generally, embeds digital monitoring in common practices of care, responsibility, and civic duty. Power can be exercised through consent, nudged by moral force, and by constant feedback. Surveillance seems natural and

benevolent, while the state's capacity to regulate movement and contact steadily expands in such conditions. This strategy diminishes the opportunities for refusal while redefining surveillance as a standard feature of public health governance practice.

8.4.3 Technological Description

Whether it is operated by human contact tracers or works as a smartphone application, the contact tracing programme is intrinsically assisting the government to manage lockdown and self-isolation efficiently. Therefore, this type of contact tracing means has a nature of mass surveillance that could be considered as an evil thing linked to social control. During the COVID-19 crisis, surveillance means were generally categorised into health surveillance. Greitens (2020) noticed that these surveillances have reshaped many governments' approaches to the privacy of health data and the use of digital tools in order to protect public health, safety, and social stability. Intrusive data collection cannot be avoided when digital tools are employed for pandemic control. The biometrics commissioner's statement urges that this form of surveillance "should be regarded as time limited and should be included in emergency legislation" if this form of surveillance "benefits the society and its citizens to such an extent as to outweigh any intrusion into an individual's general right to privacy," and if the coronavirus threat is permanent ([G1-UK-Text 1], [2.1] & [3.3]).

In practice, the UK did minimise the risk of privacy invasion by adopting a decentralised mode for the formal version of the contact tracing app. Introducing technological terms like "Bluetooth" and "random ID" can inform the audience of an effective detective mode with privacy protection adopted in the application.

Introducing technical jargon like "Bluetooth" and "unique random IDs" into the government's advocacy for the COVID-19 app can set two significant agendas to shape discourse and raise public acceptance.

Primarily, the precision in technological language seeks to impart a sense of sophistication and cutting-edge design. These terms create an image of a carefully designed app, employing advanced features to ensure both privacy and security. This strategic deployment aims to persuade the public by building confidence in the app's technological advantage. The use of such technical terms can induce a prevailing belief that advanced technology is synonymous with reliability.

Furthermore, mentioning tech companies Google and Apple can add an extra layer to the persuasion, as people's trust is generally associated with these brands.

In summary, the references to technical terms in the government's persuasion strategy can improve the perceived credibility of advanced technology.

Section Conclusion

Overall, this section demonstrates that UK pandemic communication operates by a coordinated set of discursive strategies that redirect attention away from mass surveillance while retaining its governing effects. Renaming practices, claims of voluntariness, privacy-focused technological descriptions, and moral appeals to care and responsibility are some of the strategies used to normalise digital monitoring as a routine element of public health practice. Surveillance is depoliticised and reframed as ethical, technical, and civic, in a manner that reduces space for contestation. Control thus works less through coercion and more through consent, which permits the state's regulatory capacity to expand while appearing limited.

Analytical Conclusion

In short, social and cultural discursive performance of government statements in the UK illustrate an anticipatory performance that aims to diminish the apparent mass surveillance. As Van Dijk (1998, p. 39) notes, people's social understandings of communicative situations are shaped not just by existing scripts but by dominant group attitudes, which are themselves structured by ideologies. In the process, official discourse consistently expects the public to be sensitive to privacy and data misuse in a liberal society and adapts its language.

Fairclough's construction of the "order of discourse" helps further clarify this process. Discursive structures are shaped by underlying conventions that both represent and reproduce social order (Fairclough, 2001). Within the UK corpus, liberal ideology operates conventionally, informing how surveillance is expressed, justified, and limited. This means that a national-scale contact tracing app is being promoted within this discursive framework, foregrounding legality, proportionality, and privacy, in recognition of liberal-democratic norms, even in the face of a crisis.

The analysis reveals that the promotion of biosecuritisation actions and tools is heavily influenced by liberal ideology, specifically the values of personal privacy and individual consent. Strategies of linguistics and communication try to shift focus from surveillance as a

political act to the app as a public health tool aimed at the protection of all. At the same time, instances of coercive language reflect the conditional nature of individual autonomy.

Discourses like these imply that the state leaves itself the capacity to intervene more forcefully if voluntary compliance is insufficient. Public safety is what comes first in times of crisis, and certain freedoms might be temporarily curtailed. This is not an indication of democratic hypocrisy, but it illuminates the flexibility of liberal-democratic systems for handling emergencies. The institutional oversight, represented in the role of the Biometrics Commissioner as an independent body, shows how the surveillance systems are controlled by law and at time scale. This process allows the state to achieve public health goals while holding itself accountable and ensuring the normative basis of individual rights remains intact.

Chapter 9 - China CDA

9.1 Chapter Overview and Key Findings

This chapter delves into the multifaceted discourses relating to China's HCS implemented during the COVID-19 pandemic. It is structured to provide a comprehensive understanding of the themes, interpretations, and implications of these discourses, particularly in the context of China's social-political environment.

Section 9.2 *Overview of Discourses* sets the foundation by identifying and outlining the primary themes prevalent in official communications regarding the HCS. This section examines how the Chinese government emphasises the adoption of advanced technologies like big data and facial recognition while largely disregarding privacy concerns. By checking key terms and their frequencies, it juxtaposes China's technological discourse with the UK's focus on privacy and security. The section also explores the legal implications and the use of militarised language in official statements, revealing how these elements reflect China's governance strategies and cultural values. The discussion of minimal consideration of privacy issues, particularly in the context of Shanghai's Suishenma system, indicates the different standards and perceptions of privacy in China compared to the UK. Legal consequences for non-compliance are portrayed not just as public health measures but as legal obligations, demonstrating the government's stance on maintaining control and ensuring public cooperation. The militarised language used in official communications is analysed to understand its role in fostering a collective sense of duty and unity among citizens, similar to a wartime mentality.

Section 9.3 *Discourse Interpretation* builds on the overview by providing a deeper analysis using Hobb's framework. This section interprets the intentions behind the discourses and examines the existing knowledge and beliefs they represent among the Chinese public. It aims to uncover the power relations and ideological influences embedded within these communications, offering insights into China's cultural-political context. The emphasis on big data is evaluated as a reflection of China's centralised governance model, which prioritises social control through technological means. It then reveals how privacy is reframed as a manageable technical issue rather than a substantive right, and behavioural control is normalised through paternalistic and moralised messaging. Technocratic language further depoliticises mass surveillance by presenting it as a neutral system of optimisation.

Militarised narratives reinforce unity and duty, embedding compliance within national identity.

Section 9.4 *Missing Discourses* addresses the gaps in the official narratives, highlighting what is silenced or excluded within state communication. It identifies the absence of substantive discussion on privacy protections, emotional and psychosocial impacts, and individual rights, despite their clear relevance to a system that governs mobility, access, and everyday life. These absences reveal how the discourse constructs limits on what can be publicly acknowledged or debated, reflecting broader patterns of paternalistic governance, technocratic framing, and restricted civic space.

9.2 Overview of Discourses

9.2.1 Discourse Identification

This section introduces the identified discourses related to China's HCS during the COVID-19 pandemic. It presents the themes highlighted in official documents such as big data and technology/technological, limited concern for privacy, the legal obligations set to ensure compliance and the role of tech in justifying state surveillance, behavioural restriction, and militarisation. Part of the preceding outline of Chinese political culture and governance practices is provided to reflect on the UK.

Frequently mentioned technocratic keywords, such as "big data" and "technology/technological", will be first evaluated by using word frequency analysis in the evaluation section. For example: "big data", "technology/technological". Such keywords are different from the technocratic phrases used by officials/writers in the UK, which allude to issues of privacy and security defence (such as Bluetooth and unique random IDs. These keywords in the socio-political context of China may mean that the state's pandemic management strategy reflects a society-of-control logic through a centralised data-driven system of population governance. The predominant solution to social and public health challenges is technological optimisation.

 In the examined texts, privacy concerns are not commonly present. However, two samples ([G5-CN Text 9] & [G5-CN Text 10]) focus directly on later request to opt for privacy and data security optimisation in the use of existing HCS, whereas these are not taken into account either earlier or during the initial phase of design.

Studying a militarised discourse in Chinese government propaganda during the public health crisis is critical to comprehend the socio-political context and its potential effect on perceptions. Militarised discourses regularly show up in Xi's two speeches and [G3-CN-Text 6], which explains this as well as comments upon big data efficiency in pandemic control. It works to highlight the nature of the situation and the sense of national duty instilled in citizens. In this model of crisis, the emphasis is upon state violence to consolidate political power by mobilising people to act through the same mechanism that the CCP used to suppress dissent. Such war stories connect current governance of the pandemic to more traditional CCP practices of mass mobilisation, as seen in narratives during the 2003 SARS outbreak and Xi's constant references to "people's war", "overall mobilisation" and "front-line sacrifice".

Analysing these discourses illustrates how the Chinese government leverages certain languages to rally support in the public sphere, reinforcing its authoritarian agenda in crisis situations. Notably, key themes such as big data and advanced technology, the lesser attention paid on information privacy issues, and militarisation reflect the central government's prioritisation of social control and public health management. Additionally, the positive perception of technological advancement and the prevalence of militarised wording give importance and promote the citizens' sense of national obligation. It is essential to understand such discursive phenomena, if we are to understand how Chinese governments approach crises/public-health situations and apply social control.

9.2.2 Identified Discourse Explanation

This section details the identified discourses, providing an overview of how they are presented in the texts and examining the social-political contexts associated with them. This analysis sets the stage for the more in-depth evaluation process in section 9.2.

1. Benefits of Big Data

The word frequency related to the term "*big data*" will be first evaluated to understand China's focus on adopting advanced technology for biopolitical governmentality. This term has been found 21 times in 6 of 10 texts over the corpus. Xi Jinping's speech ([G1-UK-Text 1]) directs that big data should be used as a supportive tool in disease prevention. [G3-CN-Text 5] introduces the "Big Data Bureau" that underlines the country's prioritisation in exercising advanced technology. [G3-CN-Text 6] explicitly introduces the role big data technology played in the HCS's operation during the first stage of launching the HCS. [G4-CN Text 8] provides further details on the advantages of big data in ensuring both economic recovery and disease control. [G5-CN Text 9] and [G5-CN Text 10] suggest that the use of big data in disease data monitoring and analysis should be regulated to prevent personal information misuse.

This is a discursive phenomenon in accordance with China's centralised governance mode, where the central government is more focused on data-driven decision-making and social control. It is essentially akin to Foucault's concept of biopolitics, which made clear the power exercised on populations by turning individuals into digital data and managing them. The integration of facial recognition technologies and automated systems has exemplified what Andrejevic et al. (2024) term *granular biopolitics*. This form of governance individualises control without relying on the internalisation of disciplinary norms. Instead, it customises the

environment to manage populations, utilising real-time tracking and data analysis, to preserve productivity and public health. Surveillance technologies with big data for tracking public movements and enforcing quarantine, therefore, reflect Foucault's theories in relevance today. These technologies allow for the ongoing surveillance and intervention of human life management, while controlling the flow of the entire population, thus exemplifying the principles of biopower in the digital age. Foucault's concept predicted the role of technology in modern governance and the reliance on algorithms that are precisely manifested in China's response to the public health crisis.

China's encouraging rhetoric concerning digital technologies also demonstrates greater cultural and ideological foundations. Confucian paternalism and socialist collectivism both foster strong social control and provide a basis for creating legitimacy for state-driven technological development. Technology is frequently positioned as serving the public good, not elite interests, making the state-technology connection more natural and thus beneficial. This is reflected throughout the corpus when big data and automation are reframed as solutions to protect the collective and not as sources of risk or intrusion.

Yet at the same time, these systems were framed as absolutely technical solutions that shifted attention from questions of power and responsibility to "big data," rather than questions of specific ideological and value-laden decisions. Throughout the Chinese corpus, officials and experts use the language of standards, platforms, "interoperability," and "optimisation," which makes a highly political project of mass surveillance a technical matter of coordination and effectiveness. This limits the room for discussion involved with citizen rights. Dissent with data-driven measures can instead be reinterpreted as ignorance or opposition to science.

Therefore, the use of big data and facial recognition is associated with China's political culture of centralised control and management of social stability. It indicates the integration of technology into various aspects of daily life, as the Chinese government is actively taking technological advancement as a tool for governance. The discourse of big data does more than describe technical capacity. It actively legitimises a broader apparatus of surveillance and control and naturalises biosecuritisation as an inevitable and reasonable mode of crisis governance.

2. Privacy Concerns in China's Social Context

Fewer privacy concerns should be seen as an important discursive phenomenon in China's national communication system concerning the use of intrusive technology, as this country

has an obvious difference in understanding of what privacy means from the UK. As part of this, cultural collectivism plays a major role in fostering a culture which fails to concern much about privacy. When viewing surveillance policies framed as an instrument of collective health and safety, the people might be more inclined to accept such measures.

The aim of this will be examined to establish how China's social norms and political norms relate to the same common sense around privacy. When scrutinising the texts that were sampled, one can see that privacy issues do not appear in the majority of the HCS related text except for the last two, which call for utilising personal information under legal protection.

Still, the lack of privacy issues might also be related to the state's authoritarian mode, where potential dissenting voices against the HCS can never be freely discussed because the central government completely controls media organisations.

3. Emphasis on Behaviour Control

Discourses involving strong restrictions on personal behaviour in the Chinese context corroborate the country's unique approach to public health management, which is noticeable to be compared with the UK's cases. The HCS, explained in detail in texts [G2-CN-Text 3], [G3-CN-Text 4, 5, 6, 7], and [G4-CN-Text 8], demonstrates China's centralised and stringent control over individual movements during the COVID-19 pandemic. This system contrasts sharply with the UK's more autonomous approach. By examining these discourses, I gain insight into China's prioritisation of collective safety over individual freedoms, reflecting deeper cultural values and political ideologies.

4. Technocratic Narratives

The Chinese corpus contains extensive technocratic narratives. The pandemic is described as a technical problem requiring precision control, big data platforms, unified standards and intelligent systems. Its views about the pandemic are not presented as something addressed to the public's discussion. In texts such as [G2-CN-Text 4] and [G3-CN-Text 6], health governance is described as optimising data flows, algorithm refinement and achieving better "interconnection" and "mutual recognition" between regional systems. The Health Code provides the most precise means of "seeing" reality. Risk, movement and contact are technical outputs, and the power is transferred to the platforms that produce them.

This is particularly evident in [G5-CN-Text 9] and [G5-CN-Text 10]. It concentrates on authorisation rules, anonymisation, deletion cycles and access controls. Privacy, consent and

data protection are seen as technical settings, not ethical limits that might curb surveillance. And corporate involvement is recast using technocratic language.

Citations to Alipay, DingTalk, Alibaba Cloud, "Big Data Bureaus", and "precision control mechanisms" present companies as neutral infrastructure providers. They are seen as actors providing efficiency, innovation and problem solving, not as firms embedded in state power. The triumphs of "one person, one code" management and the successful delivery of inter-provincial recognition are celebrated, with the long-term consequences of platform-state integration left unexamined. While some describe private companies as technical assistants in this discourse, this is simply a model of platformised governance with the private sector functioning in part as an extension of the state.

These technocratic narratives construct a knowledge order predicated upon algorithmic systems, data standards and expert management. Biosecuritisation refers to a process of continuous data processing and system optimisation. It is not seen as a political project that can be contested or constrained. The language of technology and expertise presents the HCS rational, objective and inevitable; it reduces space for alternative values, including rights, autonomy or public debate around acceptable forms of surveillance.

5. Strong Restriction on Personal Behaviour

Personal behaviours are strongly restricted in comparison with COVID-19-related restrictions in the UK, so discourses linked to strict behaviour control will be examined. All sampled texts contain instructions and descriptions of behavioural management. [G2-CN-Text 3], [G3-CN-Text 4, 5, 6, 7], [G4-CN-Text 8], report and explain government intervention in restricting individual movements through the HCS's colour classification. [G3-CN-Text 5] reports the initial implementation of the HCS and public response to its movement control mechanism, while [G3-CN-Text 6] elaborates on the technical details and infrastructure supporting the HCS's "one person one code" mode. [G3-CN-Text 4] provides the case of returning workers permitted to travel by the HCS's colour classification, illustrating its effectiveness in Zhejiang Province. [G3-CN-Text 7] introduces the code issuing rules in Shanghai, bringing out a new restricted type of individuals named the "sub-close contacts." [G4-CN-Text 8] explains the role of big data in the HCS's operation in efficiently gatekeeping abnormal code holders.

Unlike the UK's behaviour control mode during COVID-19, which depended more on individual autonomy and lacked specific rules to control the movements of close contacts,

China's policies are detailed. The HCS, particularly its yellow code classification, which strictly controls the movements of close contacts, is a more centralised and enforced method of public health management.

6. Militarisation

Militarised discourse had more intensely appeared in government propaganda from the beginning of the public health crisis until the end of it. Xi's two speeches contain a large number of militarised keywords that will be evaluated. However, the corpus does not include other militarised materials, such as street posts and social media propaganda. These materials are excluded due to a lack of stable archival access and the absence of comprehensive elements of political communication, such as clearly attributed institutional voices and formalised argumentative stages.

The strategy of adopting militarised languages such as "the overall battle of epidemic prevention and control" and "Winning this people's war against the epidemic relies firmly on the people" ([G3-CN-Text 6] & [G1-CN-Text 1]) has multiple propagandistic purposes. Firstly, these terms place great emphasis on the gravity and urgency of the situation. The term *battle* is used to convey the idea that the urgency needs to be dealt with through immediate and collective action. Secondly, this narrative aims to implant a sense of national commitment and duty among the Chinese population. The term *battle* implies that individuals are part of a great collective effort. It builds a mindset of unity and reinforces notions of shared responsibility for public health and safety. These terms are related to a Chinese tradition of framing public health crises in terms of national defence. For example, during the 2003 SARS outbreak, the militarised phrase *"battle against SARS"* first appeared (Gov.cn, 2005).

For this reason, the use of militarised language has a contextual relation to historical context, which influences familiar narratives to shape public perceptions and acquire support for government actions. Using such terms can lead to a sense of togetherness, emphasising that citizens are collectively engaged in overcoming challenges.

To sum up, the identified discourses offer an integrated rhetorical project of constructing the HCS as an indispensable, efficient, morally grounded instrument of governance. Big data becomes positioned as a technical solution, privacy as a marginal concern, behaviour control as a norm, technocratic language obscures power, militarised metaphors mobilise unity and urgency. These discourses offer a coherent justification for extensive digital surveillance and

centralised authority during the pandemic. They elevate state-led technological control as both rational and inevitable, while limiting the space for alternative interpretations or potential discussion around individual rights issues.

9.3 Discourse Interpretation

This section analyses the discourses identified above by partly using Hobb's framework. The possible intentions of the writer/speakers, and what kind of existing knowledge among the public is represented when they convey the messages, will be carefully explored. These interpretations are imperative to discover the power relations and ideological influence in China's cultural-political context, which are helpful for this comparative study.

1. Benefits of Big Data

Evaluation

The repetition of "big data" is intentional and is meant to connect the political rhetoric surrounding it with society's understanding of modernity. Socialism with Chinese characteristics as national policy is rooted in the political ideology of the state to lead and encourage economic and technological progress. Therefore, this repetition functions as the literal embodiment of this ideology. It shows the overall purpose behind this government of getting to tech and making it for a better world for people. It also acts as a rhetorical strategy to represent the narrative of what is happening to technologically induced human development, or even contemporary socialist political governance, in a positive manner. This strategy can serve to frame public perceptions in such a way that they associate the government's action with modernity and efficiency.

China's centralised government views big data technology as a potent tool for effective governance, particularly in managing public health crises. The state's authoritarian structure enables quick policy-making without extended deliberations often processed in democratic systems. China can thus immediately deploy this type of advanced technology to monitor, trace, and control the spread of contagious diseases. Furthermore, the 2003 SARS outbreak has embedded the Chinese government with previous experience. They recognise that a rapid and comprehensive measure is imperative for responding to similar situations, which also encourages the government to use big data to control the spread of the disease, especially in a country with 1.412 billion population.

Knowledge Representation

This emphasis on technology is closely linked to the CCP government's policy of actively promoting a "Digital China." At the end of 2017, Chinese President Xi Jinping stressed the need to "implement the national big data strategy to accelerate the construction of a digital China," noting that big data represents a new stage of informatisation development. He indicated the importance of using big data to promote and improve people's livelihoods, stating that big data has great potential in ensuring and enhancing the well-being of the populace. The strategy seeks a people-centred development approach, advocating concepts like "Internet + Education," "Internet + Healthcare," and "Internet + Culture" to reduce the need for in-person visits and enhance the accessibility, inclusivity, and convenience of public services (CPC News, 2017).

Hence, in the absence of cultural scepticism and hostility towards high technology and digital surveillance, which generally exists among the British public, the repeated emphasis on big data used in pandemic control could be an inevitable approach taken by the CCP government when implementing the HCS and related supportive devices. This approach has two effects. First, it meets Xi's strategic policies in terms of propaganda. Second, it may provide the Chinese public with a sense of security, as they generally have a more open acceptance of high-tech products.

Chinese audiences' perception of "big data" can be influenced by a collective consciousness that it is an advanced and efficient tool for dealing with the ongoing public health crisis. With a tremendously large population of over 1.4 billion, Chinese citizens may expect effective governance in this situation. "Big data" is therefore presented as a tool to manage and govern such a vast population efficiently that the public would be expected to see.

The concept of big data has been deeply internalised in China for years, and its use has gradually extended into numerous dimensions of daily life. For instance, Alibaba, the technology company specialising in electronic commerce, uses deep analytics and data insights to predict buying trends and user behaviours (Whitebox, 2022). Short video platform TikTok China uses big data analysis to recommend content based on users' preferences (Hu, 2020). These practices of big data analysis have been supported by the government since 2015, as the big data industry is backed by the CCP for implementing a national strategy, as the scheme is brought out in the Third Plenary Session of the 18th CPC Central Committee (People.cn, 2015).

Big data practice has hence been normalised for Chinese citizens. As individuals experience the benefits of personalised recommendations, targeted services, medical services, and many government services based on the centralised real-name-information platform, the perception of big data can be shifted from a strange concept to a practical and positive tool (Gov.cn, 2019). In short, the national strategy supporting big data brought tangible benefits experienced in daily life that have shaped the attitudes among Chinese citizens.

2. Privacy Concerns in China's Context

Evaluation

The different levels of privacy in the collected texts are striking compared to those in the UK. It should be noted that the definitions of privacy in these countries are not comparable and that there are different historical developments that each country has suffered -- whether economic or political -- that have shaped their own particular social and cultural values, which are different from others.

Lu (2022) emphasises that research on the right to privacy in the Chinese context needs to adhere to indigenous logic rather than be based on imported international standards. Given the above context, China's privacy standards cannot be put directly next to those of the UK. It is worth noting that countries with contemporary democratic approaches today will, again, find a way to set individual privacy rights according to Western standards. As noted in Chapter 4, Western ideas about privacy are largely shaped by British social and political culture. Direct comparisons of China's privacy standards to the UK's are risks reproducing an Anglo-Saxon-centred normative construction that draws upon its own normative assumptions. Therefore, this part's evaluation of different privacy standards, while having a comparative significance within the overall contextual environment, merely aims to explore how China's unique privacy concepts influence official rhetoric in implementing the HCS.

Discussion of privacy issues being opened on the use of the HCS in [G5-CN-Text 9 & 10] is rare during the pandemic overall. In these two cases, privacy is understood as a legislative and managed issue, not a cornerstone right. Privacy concerns are largely absent in all the other HCS-related texts. This indicates that privacy is not seen as a major political or ethical issue in public communication.

In addition, Hangzhou, the first city to implement the HCS, had officially notified residents about the system development and operational management regulations formally in July

2020. This official notice was issued by the Hangzhou city government, and indicated that personal privacy information processed by the project will be in compliance with privacy protection laws (Hangzhou.gov, 2020). However, in November 2021, the first law to impose a personal information protection law on individuals only took effect (Gov.cn, 2021). China's constitution even laid down precise privacy protection laws first in 2021 (News.cn, 2021). This also meant that the previously mentioned privacy protection had no clear legislative reference.

China's privacy rules have faced criticism for ambiguity, with some critics suggesting that its vague terms are open for interpretation, enabling the government to threaten the individual's ability to preserve privacy for the sake of collective interests (CJTL, 2022). This legal model generates the rhetoric that does not take privacy into account in the discourse of the official language. Put differently, the lack of concern for privacy in the communication of government is a problem arising from legal incoherence and cultural acquiescence.

Knowledge Representation

The notion of privacy in China is different from what is seen in Western societies. Traditional Chinese cultural consensus tends to link privacy to personal discretion and immorality. That is, people often see privacy as things they want to hide, such as a person's unethical sexual relationships or any type of immoral behaviour that should be kept secret. Such a cultural factor might influence the vocabulary of official narratives. Historical phenomena, such as the Cultural Revolution and the Land Reform have further diminished the sense of private interest; private ownership was abolished and turned into state or collective interests. These occurrences can easily reduce the public's feelings about personal privacy rights to the level of a rank-and-file individual -- a perception that is unlike the UK approach to privacy that emerged over the years in the country's history of capitalisation.

Due to the influence of the traditional culture and concepts, privacy is often viewed negatively in the Chinese context, making privacy a subject of negative criticism in relation to social morality. Chapter 4 elaborates on this phenomenon. Hence, privacy under the influence of Western universal values is very different on another level as to Chinese values.

This context may explain why privacy seldom manifests in the Chinese corpus as a value that must be guarded. And not only in those, but other texts there is the lack of privacy language alongside dominant narratives of compliance, efficiency and collective responsibility. For instance, in [G3-CN-Text 5] ([1.2]) HCS is described as a "passport for working, studying

and living", in that it assumes digital visibility, not privacy, as the condition of social inclusion. Similarly, algorithmic colour classification is described as a non-detrimental administrative device [G3-CN-Text 7] without regard to its interference with personal data. Surveillance that is thus normalised as normal, routine governance and all personal information is treated as a public commodity to be stewarded for collective safety.

3. Emphasis on Behaviour Control

Evaluation

In the official narrative that is used by the HCS implementation and use in China, such regulation is framed repeatedly as both necessary and morally expected. In [G3-CN-Text 5] ([1.1]), "the green code is the passport for working, studying and living in the city" establishes digital compliance as the fundamental precondition for normal life. In [G3-CN-Text 7], people are classified by colour categories based on algorithmic assessments. Likewise, as in [G4-CN-Text 8], the use of expressions like "one person, one code", and rapid isolation within "15 minutes," illustrate how behaviour is continually monitored and corrected within a system of continuous digital visibility.

Personal agency is rarely acknowledged in these texts. Instead, compliance is presented as a civic duty. As seen in multiple PDA segments, behaviour regulation is portrayed not as negotiable public policy but as an unquestioned public obligation. The cumulative effect is a discourse that normalises behavioural governance as both necessary for health and morally expected, leaving little room for alternative views on risk, responsibility, or mobility.

Knowledge Representation

In [G3-CN-Text 6] ([3]), Xiang mentions that with the support of big data technology, the "One person one code" mode can "manage key individuals, allow healthy individuals to move freely". This statement, in the Chinese specific linguistic context, carries a stronger implication of surveillance and control over individuals. In the original Chinese text (Xinhua, 2020), the term "管住" (*guan zhu*, manage) is a uniquely Chinese verb that often conveys a strong top-down power dynamic. For example, "管住你的嘴" (guan zhu ni de zui) in the modern Chinese language does not merely mean "manage your mouth" in the literal sense but is more akin to "muzzle your mouth" in English. From the perspective of pragmatic perception, the verb "管住" (guan zhu) has a nuanced negative sense of controlling and managing objects that have a lower class than the subject, and it also has a stronger emphasis

on power inequality rather than a simple semantic meaning of control. This linguistic phenomenon reflects Confucian thoughts, which emphasise a paternalistic management style. In this mode, the government is viewed as the "parent" of the nation, responsible for protecting and managing the citizens as "children". For details about the paternalistic management style, please view Chapter 4.

The Chinese government's strict control over its people is also closely linked to its historical political culture. As discussed in Chapter 4, the manner in which governments exercise power and their political cultures are closely related to their historical experiences. Unlike the UK, China's feudal system of absolute imperial rule only terminated in the late 19th century with the fall of the Qing Empire. Furthermore, China did not experience revolutionary events which have been listed in Chapter 4. Therefore, without a series of political and cultural transformations, the government has always maintained absolute control over its citizens. Additionally, the failed Self-Strengthening Movement and Hundred Days' Reform in the mid-to-late 19th century directly resulted in the absence of democratic and liberal consciousness in Chinese political culture. These complex factors collectively explain why the Chinese government adopted such stringent control measures during the COVID-19 pandemic.

This cultural-political environment is visible in the HCS discourse. For example, the categorisation logic in [G3-CN-Text 7] treats populations as administratively sortable units rather than rights-bearing individuals. In [G5-CN-Text 9 & 10], privacy concerns are acknowledged only within narrow legalistic boundaries, while surveillance is justified by emphasising collective safety. Behavioural regulation thus appears as a default assumption rather than a policy choice.

Indeed, surveillance practices and corresponding actions, including quarantine enforcement, mobility restrictions, and mandatory data submission, are described as regular and rational extensions of state regulation. Chinese official discourse does not present behaviour regulation as invasive, but as inseparable from public order and collective welfare. Consequently, the linguistic, cultural, and historical dimensions serve to strengthen a style of governance which assumes behaviour regulation is a morally sanctioned civil duty and ingrained in larger biopolitical management.

4. Technocratic Narratives

Evaluation

The HCS-related discourse is framed as a technocratic narrative that describes pandemic governance as fundamentally technical, not political. Decision-making is commonly articulated in the terms of "big data application" and "scientific management". This narrows the range of potential discourses or differences of opinion on political decisions. Technocratic languages redistribute authority. Terms in [G3-CN-Text 4] such as "foundational data sharing" ([17.1]), "National Health Information Platform" ([17.4]), and "unified data standards" ([18.3]) shift evaluation from ethical or political considerations to systems and procedure compliance. Accordingly, the credibility of the HCS depends not on participatory deliberation or rights-based safeguards, but on technical architecture and legal wrappers. When privacy is discussed (e.g., in [G5-CN Text 9 & 10]), it is treated as something that must be managed internally by the system in the form of anonymisation, deletion rules, or informed consent, rather than a value, which could constrain or remould surveillance. It shifts privacy from a possible limitation on power to a variable that can be optimised within an already accepted surveillance infrastructure.

Knowledge Representation

Technocratic narratives in the Chinese corpus construct knowledge about the pandemic, in which data and systems (not citizens or public debate), become the main focus of governance. Big data and algorithmic colour categorisation are presented as a reliable tool for identifying risk and guiding decisions. In this practice, health status and movement are authenticated by technical systems, while human judgment is relegated to a secondary role, which responds to the output data.

Technology is represented as objective and self-evidently beneficial in the corpus. In [G4-CN-Text 8] ([4]), the colour classification is presented as the outcome of "big data comparison" of the national risk index, stay duration in risky areas, and close-contact information. This naturalises the translation of individuals into data as a neutral operation. Similarly, [G3-CN-Text 6] gives positive comments for "one person, one code" as a mechanism to manage the population's movements, turning an invasive socio-technical infrastructure into a common-sense solution to an administrative problem.

These discourses also reconfigure authority. Overt ideological justification is replaced with expert languages and standards. In [G5-CN-Text 9 & 10], concerns about data abuse and privacy are sublimated into discussions of the Cybersecurity Law. Hence, the issue becomes

not whether extensive tracking is acceptable, but how it should be carried out through corresponding regulations.

The same logic shapes how citizens are represented. Individuals appear less as rights-bearing subjects and more as objects of data management. In [G2-CN-Text 3], the green code is a conditional entitlement for entering train stations. [G3-CN-Text 7] lists Shanghai's "five types of red code" and "four types of yellow code" that turn health status into a categorical output of the Suishenma system. These colour codes decide which group of people are allowed to work, travel, or access public services. The decisions are disguised by technocratic language as neutral outputs of an impersonal system, even though they enact a biopolitical sorting of the population into varying levels of risk and permission.

5. Strong restriction on personal behaviour

Evaluation

With its strict colour-based classification (green, yellow, red), the HCS is an embodiment of China's governance model of centralisation. The system allows the authorities to manage the pandemic effectively by classifying citizens by their health status and travel history. Such a granular level of control demonstrates the Chinese government's desire to preserve social stability and core values in its political culture.

The role of big data and digital management tools in Chinese state power is closely related to biopolitics, which describes a societal power structure in which the state exercises power over populations by turning individuals into data to be managed. The narratives about the HCS focus on the reopening of work and economic activities, such as in [G3-CN-Text 4]. And by allowing only those with green codes to move freely, the government achieves disease control while facilitating economic recovery. This is seen in an example of Zhejiang Province ([G3-CN-Text 4]) with its application of the system, where big data serves to coordinate epidemic prevention and work resumption. This story framing moves the focus from system limitations to its role in economic recovery.

Across the Chinese corpus, directives with "must" appear 127 times in total. This rhetoric demonstrates an imperative communication style. Non-compliance is morally coded as a threat to public welfare, which reinforces the notion that behaviour regulation is both expected and legitimate.

Knowledge Representation

In late 2019, the country lacked facilities and software to limit population movement when the coronavirus outbreak emerged. Colour classification, therefore, is a tool developed under pressure that can work as a population management method in China's largely populated society. Such strong restrictions on behaviours were designed to achieve the country's short-term goal of limiting the virus transmission. The CCP's centralised power structure allows it to rapidly implement policies across the state without significant opposition. This centralised mode enables instant decision-making and enforcement, particularly in times of crisis. The Health Code, a tool developed under the urgent conditions of the pandemic, is a prime example of how the government can utilise its authority to enforce widespread compliance with public health directives.

The government's vision was obvious: to contain the spread of the virus through tight control measures. The successful implementation of these measures greatly depended on the compliance of the population, which was ensured by the government through surveillance and direct, authoritative communication. The idea of "social harmony" is built in deeply. People are generally expected to subordinate their personal interests for the benefit of the community. Such cultural disposition makes the populace far more amenable to highly regulated government imposition of measures, particularly so in times of emergency. Consequently, the HCS was more than a mechanism of technology. It mirrors societal attitudes of a greater communal welfare. The government's communication strategy during the pandemic has often relied on simple and stern narratives that positioned compliance with Health Code regulations as a vital societal duty. This strategy had worked in a society used to authoritative governance and not so much inclined to challenge the advice of the state. Another example appears in [G3-CN-Text 6], as officials describe the HCS as the "passport" for work, study, and daily life, implying that normal participation in society is contingent on obeying state-defined behavioural requirements. This framing turns access to ordinary activities into a reward for compliance, making refusal or inability to comply into a socially irresponsible and morally suspect act.

This can be understood effectively through the lenses of theories on governmentality and biopolitics--how states regulate populations through techniques of power and knowledge. The HCS is, first of all, a typical expression of the concept of governmentality because, through the existence of a regulatory framework, it orients individual behaviour in such a manner that it links personal health statuses to state objectives. Therefore, under the guise of public health safety, a regime of surveillance and control can be built. This system of colour classification

works as a biopolitical tool. It manages citizens by health data and travel history, and directly influences the freedom of movement and access to public spaces.

6. Militarisation

Evaluation

Using militarisation of language has been a consistent theme in the CCP's discourse, as historical war events during the party's development, such as the Sino-Japanese War, Long March, and the civil war between the CCP and the KMT (Chinese Nationalist Party), have deeply influenced the political party's core ideology which fostered the concept of *Douzhen Jingshen* (Spirit of Fighting and Struggling) (Yang, 2023). Xi Jinping emphasises the idea that "*Douzhen* is an art, we must be good at it" and describes the COVID-19 pandemic control response as a "people's war," "total war" and "resistance battle" (Yang, 2023). Similar descriptions also frequently appear in his two speeches. In [G1-CN-Text 1] ([6.6]), he describes the pandemic control as a "people's war, a general war, and a blockade war." Other militarised languages, such as "resolutely win the battle to defend Hubei and Wuhan" ([G1-CN-Text 1], [19]), "an intense and heroic battle against the COVID-19 epidemic" ([G1-CN-Text 2], [1.1]).

The choice of militarised terms serves to mobilise public cooperation that can create a shared identity of citizens as soldiers on the battlefield against the pandemic. For discursive practice, framing pandemic control as a war can influence public perceptions and make relevant policies a patriotic duty.

Knowledge Representation

Such a militarised language choice would lead to a sense of national duty among the public. This narrative anticipates the citizens' response of desiring to contribute to a national-level good, so that they will be willing to participate in the "battle against COVID-19".

In this way, high linguistic familiarity manifests itself in faster and more accurate retrieval processes, in faster and more accurate identification and recognition of stimulus patterns, and in higher speed and accuracy of both psychomotor action and anticipation and prediction (Fenk, 2001, p. 432). The lexical proximity of militarised terms in the context of China's occurrences could push the group towards tying them to narratives of history, such as the use of the term "battle against the pandemic" which was coined during the 2003 SARS outbreak, thus allowing those who would have experienced the historical event to relate and respond in

the same way. The expectations of militarised language in the scope of pandemic control policies are shaped to a significant degree by China's political culture and historical context. By strategically selecting these words wisely, communicating to promote the use of health code-based messaging can make the use of the HCS more effective for stimulating public mobilisation (i.e., weaponisation of themselves with the Health Code).

In summary, understanding the discourses in the social and political world of China has highlighted several key social and political values. The use of the technical term "big data" becomes a deliberate combination of political discourse and a cultural understanding of modernity that demonstrates China's priority on state-structured technological development. It is framed through socialist ideology with Chinese characteristics, whichis considereds progressive in government and efficient. Therefore, this lack of privacy concerns when communicated in official communications in China speaks to what might be best perceived as a cultural consensus that sees privacy differently from a Western society based on some historical events or social norms.

The emphasis on legal duty and severe consequences for non-compliance refers to the government's use of deterrence tactics rooted in Confucian and communist ideologies, maintaining social order and discouraging dissent. Positive reviews of new biometric technology also lend some legitimacy to surveillance as a public health tool as opposed to an intrusiveness to privacy. China's colour-based classification illustrates the strong limitation imposed on personal behaviour, which underlines its centralised approach to governance and the use of technology in crisis management, allowing it to control people's personal movements accurately. This is crucial for disease control and economic recovery. Finally, language being militarised in official discourse is intended to galvanise public collusion and collective responsibility for the nation to achieve, using historical experiences and cultural familiarity as tools through which communication can be better achieved.

9.4 Missing Discourses

9.4.1 Vague Concept of Privacy Information Due to Absence of Legal Protection

The Chinese government's unique communication style in promoting the HCS is understood in the above analysis. However, there are still some fundamental questions about China's design and implementation of the HCS that need further analysis. In the above analysis, [G5-CN-Text 9 & 10] scarcely touches on the issue of whether the HCS will result in privacy breaches.

"Privacy protection" is mentioned in 3 places in the corpus ([G3-CN-Text 4], [20.2]; [G5-CN-Text 9], [7.3], [G5-CN-Text 10], [7]). Following supportive explanations use broad, abstract expressions like "protect personal privacy" ([G5-CN-Text 9], [6]), "prevent misuse" ([G5-CN-Text 9], [2.1 & 6]; [G5-CN-Text 10], [7]), but without details about how data are stored, what security standards are applied, or how long information is retained. Even when the texts acknowledge public concern, for instance, the public reaction to Hangzhou's gradient-colour health code design, these concerns are redirected toward procedural refinement rather than confronting the core question of whether mass data extraction is justified. This reflects findings of the PDA: privacy is treated as a flexible managerial issue instead of a substantive right capable of limiting state power.

This absence of explanation leaves uncertainties about the security and reliability of the government's server, which normally may undermine trust in the system's ability to safely store personal information. It is worth mentioning that *China's Personal Information Protection Law* was only deliberated and passed in August 2021, and officially implemented in November 2021 (Yu and He, 2022). Both *China's Personal Information Protection Law* and the EU GDPR require individual consent as the basis for legal information processing, inheriting the "informed consent" rule. This rule, established in previous legislation like the Cybersecurity Law enacted in 2016 (Gov.cn, 2016), effectively protects data subjects' right to information and decision-making. The EU GDPR also mandates transparent information provision and consent for personal data processing. Both laws adopt an "opt-in" model, ensuring personal information cannot be processed without consent, with substantial requirements for consent effectiveness.

However, when China implemented the HCS, *China's Personal Information Protection Law* did not yet exist, leaving a space for personal information misuse. Due to the lack of relevant legal knowledge about personal privacy information, the Chinese public is generally insensitive to the rules for obtaining and using personal privacy, leading the authorities to be allowed to use vague concepts to discuss relevant issues.

These vague concepts can help officials avoid scrutiny. The majority of Chinese citizens even including students who accepted higher education, having been prevented from developing independent and critical thinking, often lack the sense of scrutiny when receiving and processing this type of information (Tian and Low, 2011, p. 61-76; Zhang, 2017, p. 857-871). Therefore, Chinese citizens may be more willing to passively accept unclear information and

doctrines without demanding transparency because questioning authority is morally not encouraged (Zhang, 2017, p. 863). This type of ambiguity may serve as a tool to maintain the CCP's centralised control by limiting potential criticism and debates toward specific issues that require clear information, as those vague terms leave space for the government to avoid direct accountability.

9.4.2 Missing Discourse of Emotional and Psychosocial Impacts

A further absence in the Chinese corpus is a sustained dialogue about the emotional and psychosocial effects of colour-coded governance. Speeches and official news texts celebrated discipline, personal sacrifice and compliance. Citizens, developers and medical workers are praised for courage and responsibility. However, there is still no discussion of what it feels like in daily life to live under a system that constantly labels people as green, yellow or red and ties work, movement and everyday activities to these algorithmic categories.

This silence contrasts with wider research on the psychological effects of pandemic control. A rapid review by Brooks et al. (2020) revealed that worldwide measures of quarantine and movement restrictions led to high levels of anxiety, uncertainty, and fear. Large-scale surveys also find high levels of depression and anxiety symptoms among people in the general population during early phases and outbreaks of COVID-19 in China (Huang & Zhao, 2020).

Since the HCS decides who can move around or work in, or even live in, or enter the community, it is not surprising that fear of turning red can be part of the stress. Yet worries of this anxiety never emerge from the corpus. They are instead overwritten by narratives of comfort and collective resolve. Likewise, none of the Chinese samples discusses the stigmatisation that comes with the designation of a high-risk subject in any way. Studies around the world demonstrate how such identification as infected or exposed often results in social exclusion and discrimination (Bagcchi, 2020). The sampled texts never address the experiences of red or yellow holders who can be targeted for discrimination (this is discussed in Chapter 2, section 2.1.4, *Dehumanisation and Social Segregation in the Use of the HCS*).

Research on alternative contact-tracing apps indicates that frequent status-checking, fear of false alerts, and confusion about how data get used create everyday stress (Altmann et al., 2020). This silence is part of the knowledge structure sustaining China's biosecuritisation discourse: negative emotions that might challenge the system, whereas pride, duty and trust in the state are foregrounded. In Foucauldian terms, the population is treated as an object to be governed, not as subjects whose psychological well-being might limit state power

(Foucault, 2008). Colour-based surveillance thus appears necessary, effective, and emotionally uncomplicated, with the psychosocial costs of compliance largely erased.

9.4.3 Neglected Individual Rights

The corpus that was collected did not mention individual rights. Rather, many statements suggested that in a stern tone, the government demanded that individuals forfeit their freedoms in exchange for collective health and safety. The top-down mode is an essential feature of the state's centralised control process. China is the world's most populous country and has the world's third-largest land area. With China's population and territory being large, the CCP's policy of a centralised, top-down central management approach may be the only effective, necessary response to curb virus transmission. This mode of management, articulated in Chapter 4, is a cultural tradition of how the CCP has done leadership with historical crises, wars, and revolutions.

Furthermore, calling upon traditional Confucian values, which see authorities playing the part of a "parent" legitimisation, allows the authoritarian nature of the orders to be justified. This paternalistic attitude is heavily embedded in Chinese cultural and historical contexts. It is a perpetuation of a power dynamic in which the idea is that the state is the protector of the public interest and that individuals are expected to comply without question. An atmosphere that suppresses personal autonomy and intellectual independence leads to an ethos which conflates obedience to conformity with patriotism and civic duty.

The absence of discourse on personal rights is a deliberate strategy to maintain control, prioritising collective over individual rights. This sort of governance, upheld by society's cultural norms and authoritative rhetoric, emphasises stability and conformity more than personal liberty. This mode causes people to sacrifice their own interests to protect the greater benefits, thus having strong implications for how community members perceive and accept actions in the area of public health.

Section Conclusion

This section shows that the gaps in the Chinese corpus are as significant as the discourses it contains. Emotional and psychosocial impacts, individual rights, and everyday experiences under colour-coded control receive almost no attention. Instead, the texts promote obedience, sacrifice, and collective safety. Anxiety, stigma, fear of "turning red," and daily stress are treated as irrelevant to public communication.

These missing discourses point to a wider pattern of power and knowledge. A paternalistic political culture, technocratic governance, and top-down communication combine to narrow what can be publicly discussed. Citizens appear mainly as subjects to be managed, rather than individuals with rights who might question the system. As a result, biosecuritisation is penetrated in everyday governance, while concerns about dignity or limits on state authority remain largely outside official discourse.

Analytical Conclusion

The analysis of China's HCS reveals a complex interaction between technology, governance, and cultural values. The discourses identified in Section 9.1 indicate the Chinese government's strategic use of advanced technologies to control virus transmission, emphasising collective health over individual privacy and rights. This approach is rooted in China's centralised governance model, which advocates technological advancements for social control and stability. The frequent use of militarised language further demonstrates the government's effort to foster a sense of national duty and unity, positioning pandemic control as a collective battle.

Section 9.3 deepens the understanding of the ideological framework shaping China's response to the pandemic by a comparative reading of these discourses. Across big data, privacy, behaviour control, technocracy and militarisation, a consistent pattern emerges: the crisis is framed as a technical and moral problem that ought to be solved by a strong, centralised state, not as something to be contested through political choices. Technology is hailed as neutral progress, but its role as a tool of biopolitical control is downplayed. Privacy is recoded as a managerial issue rather than a right; obedience is packaged as civic virtue; and war metaphors turn compliance into patriotic duty. Taken together, these moves shrink the conceivable expanse of debate. Alternative values – autonomy, dissent, plural risk perceptions – are sidelined in favour of a discourse that naturalises digital surveillance, normalises intrusive behaviour regulation and frames hierarchical authority as both inevitable and benevolent.

In section 9.4, the investigation of missing discourses highlights major absences in the official discourse and outlines how these silences serve to preserve state power. The lack of actual discourse on privacy, emotional health and individual rights is not abnormal. It reflects a communicative environment in which only some forms of knowledge are permitted to circulate. The omission of the psychological burden of colour-coded surveillance, the dangers

of data misuse, and any language of personal rights narrows what citizens can know or question about the HCS. These silences reinforce a political culture in which collective obligations consistently outweigh individual claims. Technocratic and paternalistic styles of communication also make alternative viewpoints appear unnecessary or inappropriate. The outcome is a discursive environment that normalises biosecuritisation, restricts meaningful public critique, and embeds digital surveillance more firmly within state governance and everyday life.

China's single-party system allows the central government to make decisions and implement policies immediately, while Marxism and Mao Zedong Thought provided an ideological background for the Party's centralised control activities. This mode enabled the central government to mobilise and coordinate resources swiftly across different regions. The HCS is thus designed and employed for this type of management and control. Public concerns and individual freedom are often, inevitably, neglected in this type of management. Nevertheless, accustomed daily surveillance activities and less interest in individual rights among most Chinese citizens may have led to a relatively higher acceptance and tacit consent for the government to instruct them through an authoritarian approach. The top-down communication style left little room for public conversation or feedback, which ultimately resulted in mistrust and resistance among the population in the late stage of the state's extremely intensive pandemic control measures.

In summary, this chapter provides a deep examination of the discourses relating to China's HCS, revealing how the government uses technology, legal measures, and strategic communication to manage the pandemic. It contrasts China's approach with the UK's perspectives, unveiling cultural and ideological differences. By identifying and interpreting these discourses, the chapter offers valuable insights into China's governance strategies and their implications for individual rights and social norms.

Chapter 10 - Comparison and Discussion

Chapter Overview

The purpose of this chapter is to compare the similarities and differences I have found through a combined analysis of PDA and CDA. The analysis examines the governmental communication strategies used in China and the UK during the COVID-19 pandemic, focusing on the implementation of two digital contact tracers: the HCS in China and the NCA in the UK. By investigating promotional strategies through discursive performance, it reveals how different political systems and cultural contexts influence public acceptance and compliance with digital surveillance measures.

This chapter then discusses how China's collectivistic culture and acceptance of surveillance are influenced by its authoritarian communication style, while the UK government and NHS took care of the relationship between public health needs and individual rights within a liberal democratic framework. The chapter further explores how these approaches reflect broader trends in biopolitics and technological solutionism in managing public health crises. I aim to understand how different governance styles impact the implementation and public reception of digital surveillance tools in times of crisis.

It begins with section 10.1, which compares similarities found in the results of PDA and CDA: 1) Prioritisation of Public Health and Collective Responsibility; 2) Practice of Biosecuritisation; 3) Technological Solutionism and Technocracy; 4) Government Authority in Biosecuritisation.

Section 10.2 compares differences in the results: 1) Normalisation of Surveillance vs. Avoiding Talking about Surveillance; 2) Authoritarian Communication vs. Liberal Democratic Communication; 3) Standards of Privacy; 4) Affective Governance and Empathy in Biosecuritisation;

The discussion part starts in section 10.3. In this section, I discuss the following contents: 1) Governmentality, Biopolitics and the Society of Control in Biosecuritisation; 2) Repackaging of Surveillance; 3) Long-term Impacts on Government and Citizens' Relations to Biosecuritsation.

10.1 Similarities

Based on the comparison between the PDA and CDA, this section outlines the similarities in the official approaches of China and the UK in implementing and promoting digital biometric surveillance to combat the COVID-19 pandemic.

10.1.1 Prioritisation of Public Health and Collective Responsibility

Through the comparison of the PDA and CDA, a clear common logic emerges: both China and the UK are placing public health above all, and intrusive digital surveillance is framed as legitimate and as a matter of urgent public interest, which serves as a necessary narrative. This strategy is used to justify the necessity of surveillance technologies to protect the population from the disease, describing it as an important tool for public health management. Meanwhile, there is a shared ideology of collective responsibility in both countries. Each government maintained the idea that compliance with surveillance measures, as an individual action, contributes to society's greater benefits and safety. It encourages public acceptance of invasive technologies by framing them as essential for the collective welfare. The effective operation of these measures requires public support.

After a deeper consideration, the origins of this pattern are related to urgent risk management. During outbreaks, the government's primary goal is to quickly implement effective measures to minimise transmission risks. Based on recent technological advancements, modern surveillance technology has thus become the most effective means so far. Despite it has intrusive nature on individual rights and privacy, large-scale surveillance is currently the best method for understanding potential infection risks. In the context of Science and Technology Studies (STS), the deployment of digital surveillance technology for managing pandemics is seen as indicative of the critical role that technology plays in addressing complex health and social challenges (Bellanova, 2020). These technologies can provide real-time data to support decision-making and help governments and public health departments more precisely locate and address high-risk areas. Therefore, control and prevention efficiency can be enhanced.

Certainly, China and the UK have taken different directions in using such technologies. In China, government-controlled surveillance and big data systems for unified large-scale management were used. In contrast, the UK government's use of the contact tracing app and the COVID-Pass relies more on individual conscientiousness due to the state's native surveillance culture and various political and legal factors. However, fundamentally, before

effective vaccines and herd immunity are achieved, both countries rely on collective action to maximise the effectiveness of these monitoring systems in crisis response.

10.1.2 Practice of Biosecuritisation

The use of digital surveillance technology has very different levels of operation in China compared to the UK. China developed a centralised, state-led model, which combined biometric data, citizen information, mobility records, and platform infrastructures into a single system of population management. The UK, in contrast, opted for a decentralised, app-based approach that was structured to emphasise voluntariness, privacy protection, and legal oversight. However, despite their apparent differences, both practices exhibited the traits of mass surveillance, and both framed the COVID-19 pandemic as a security issue which threatens public safety that needs to be urgently tackled through collective actions.

10.1.2.1 Technological Development as a Key Factor to Biosecuritisation

When promoting these apps, both governments have justified the use of mass surveillance by explaining its necessity in controlling virus transmission during the severe outbreak of COVID-19. This strategy is closely affiliated with technological advancements. Over the past decade, the prevalence of smartphones has provided a sufficient technological foundation for governments to design and develop such disease monitors. In contrast, people did not have access to such advanced technological devices during the SARS outbreak in China in 2003 and the swine flu pandemic in the UK in 2009. Strictly speaking, the use of biometrics is inevitable in today's technological context. The difference lies in the distinct surveillance cultures of the two countries, leading to the adoption of different technological means in smartphone application design.

In fact, the government's adoption of these technologies might be a necessary resort. Given the high severity and mortality rates of the COVID-19 strain at the initial outbreak, quickly controlling the virus's spread became the top priority for governments worldwide. In such an emergency, digital surveillance technology provided a fast and efficient solution, although it raised concerns regarding privacy and personal freedom. Furthermore, this type of technology, particularly in China's implementation, can help governments and public health institutions better allocate medical resources. By analysing real-time data, they are enabled to identify hotspots and prepare in advance, distributing medical equipment and human resources to reduce the burden on the healthcare system. This precise epidemic management method helps lower overall societal health risks.

Although the UK government has been more cautious in the use of biometric surveillance technology, it has still demonstrated potential in pandemic management. This cautiousness provides effective pandemic control measures while protecting privacy. The NCA is not the only tool the UK government uses to control the pandemic. Other health protective measures, such as frequent hand washing, social distancing, reducing outdoor activities, and promoting mask-wearing, have been the primary means of controlling COVID-19 in the UK, unlike in China, which primarily uses a surveillance system to coordinate lockdowns. Due to the need for voluntary reporting and privacy protection, the effectiveness of this method largely depends on the active participation and cooperation of the public.

Overall, both countries essentially adopted mass surveillance technology to control virus transmission. This indicates that the development of surveillance technology is inseparable from technological advancement. The development of high technology will inevitably lead governments to adopt surveillance technology.

Indeed, for humans to control something, they must understand it better. In other words, it is difficult for humans to control something they do not understand well. For example, fire. One can find ways to light a fire only by understanding how fire is ignited, and only by knowing under what conditions fire can lead to a disaster can one learn how to prevent it. The coronavirus is also a relatively unknown and dangerous pathogen to humans. Thus, surveillance modes, whether government-centralised monitoring or encouraging the public to download smartphone apps to monitor potential dangers, can provide reliable information for users, whether governments or citizens, to control risks.

Because surveillance technology structures how information is collected, processed, and interpreted, it can also be understood as media technology. Like other media, it does more than transmit data. It shapes perception and defines what counts as risk, safety, and normal behaviour. For example, surveillance systems during the pandemic translate everyday life into categories, indicators, and alerts, producing a mediated version of reality that guides decision-making.

McLuhan's idea that media serve to extend human senses is helpful here, but the scope of that extension is uneven. Surveillance stretches the sensing capacity of institutions considerably further than that of citizens. People become more visible, while systems that track them remain opaque. This sets up an imbalance in knowledge and power.

Viewed as media, surveillance technologies impact behaviour as well. Scores, warnings, and permissions work as ongoing signals that prompt self-regulation in the name of safety. Protection is promised, but ordinary life becomes ordered around being legible to data systems.

10.1.3 Technological Solutionism and Technocracy

In both contexts, there is a fundamental belief in the utilitarian benefits of technology. The narrative suggests that the benefits of using biometric surveillance to track and control the virus outweigh potential drawbacks, such as privacy concerns. This pragmatic approach focuses on the immediate utility of technology in crisis management. Both the Chinese and UK governments framed biometric surveillance as a necessary and effective tool to manage the spread of COVID-19. Throughout both corpora, this idea is expressed in technocratic language that treats pandemic governance as a task of optimisation. Risk is quantified and controllable, and political judgment is transformed into technical performance criteria (i.e. accuracy, interoperability, speed, coverage). This technocratic idiom can be read through Morozov (2013)'s critique of "solutionism", which names a governing impulse that re-describes political, moral, and structurally contested problems as technical optimisation problems that appear measurable, manageable, and solvable through design and data. In that frame, the key question becomes whether the tool "works", while disputes about legitimacy, distributive harm, and the acceptable scope of intervention get treated as secondary "implementation" concerns. He also warns that deference to data can obscure limitations in what data can represent, and it can open space for privacy incursions packaged as progress or public good. This change corresponds with Foucauldian governmentality, in which governing operates through problematisation, measurement, and the management of conduct, while populations are made legible as data to be administered.

The widely deployed surveillance technologies and related mechanisms in China were justified in terms of protecting public health and ensuring safety. Collectivist values were emphasised, with societal well-being placed above individual privacy. More precisely, it noted that in the UK contact tracing app, Bluetooth detection technologies were a crucial protection mechanism to inform the public if they were exposed to the virus, to reduce virus transmission and ensure public health. Similarly, the surveillance technologies in both cases, the so-called technocracy, justify intervention by putting surveillance as the scientific track to safety. As a result, the main question then becomes how the system should work, not whether it should exist or how far it should reach. The ethical tension is accepted, but in practice, it

gets funnelled into processes (authorisation, time limits, privacy-by-design, deletion cycles) to keep core infrastructure intact. Morozov's account helps to clarify the political stakes embedded in this focus on "how." Solutionism thus does more than embrace technology, it centralises a line of reasoning in which governance is framed as an ever-changing, constantly-improving process. In this logic, pandemic surveillance emerges as an inevitable evolution of contemporary management, as its infrastructures offer large-scale controllability and efficiency. Simultaneously, the social and political costs of surveillance are displaced into a secondary register, reframed as issues of technical design, regulatory compliance and procedural management unlike issues of power or legitimacy.

Furthermore, both governments embraced the rapid advancements in smartphone technology to implement their surveillance measures. In China, the incorporation of surveillance technologies was fairly accepted based on the existing infrastructure and the population's familiarity with these technologies. The HCS was implemented in a timely and effective manner. It demonstrates the country's prosperous technological development and capability to mobilise resources in a public health crisis. By contrast, the UK's contact tracing app and the COVID-Pass are less invasive and rely on Bluetooth technology to achieve that end. However, both models display a Deleuzian society-of-control relationship. Regulation operates by way of consistent signals and permissions. It is the dynamic of ongoing updates and alerts that determines both movement and access. Control through modulation across the everyday contexts not only means discrete prohibitions. In China, this appears as code-based gatekeeping tied to mobility and services. In the UK, it appears as risk notifications and app-mediated guidance that seek to shape behaviour through feedback and self-management. Morozov (2013)'s observation about the diffusion of "smart" objects and built-in sensing is instructive because it illustrates how shaping behaviour becomes a normal goal of policy once everyday tools and platforms can generate constant feedback. In pandemic governance, this steering is justified in the name of health protection. Yet the same infrastructure can easily be applied to other areas of behaviour and compliance, because the system is described as a way to keep improving efficiency and control over time.

Taken together, these findings indicate that both China and the UK incorporate pandemic governance into technocratic and biosecuritised rationalities. In technocracy, crisis management is framed as one of expert calculation, system efficiency and data optimisation, which reduces political judgement to technical competence. In spite of differing political cultures, surveillance is normalised through performance metrics and procedural assurances.

Governmentality functions via datafication and behavioural modulation, and ethical tensions are channelled into regulatory processes. Consequently, technological solutionism consolidates surveillance as an enduring and authoritative form of crisis governance.

10.1.4 Government Authority in Biosecuritisation

Both governments relied on their authoritarian capacities to implement and promote these surveillance measures. In the UK, while there was more emphasis on individual consent and privacy, the government still exercised significant authority to implement biometric surveillance, justifying it as a necessary action to protect public health. In China, the centralised and authoritarian governmental structure resulted in the rapid deployment of the HCS, with the public generally accepting the measures as necessary for collective safety.

The main similarity is that, through investigating the corpus, I found the UK government and NHS were carefully balancing the need for individual rights and emergent response to control the pandemic on the basis of liberal democratic norms and legal frameworks of health protection before government power was exercised. The Chinese government's hasty response to breaking the transmission chain, which largely relied on the use of digital surveillance, was successful in effective disease control as a result of its authoritarian nature as a power of unity. These similarities suggest that the governments in public crises, whether they have a democratic system or an authoritarian system, may achieve the same result of exercising authority over the population via different means.

10.1.4.1 Impacts of the UK Legal Frameworks on the NCA

The British government's display of some authoritarian characteristics during the pandemic is a result of urgency and efficiency demands. In times of public crisis, democratic governments may face tedious and prolonged decision-making processes and complex political negotiations, which can delay fast implementation. Boin et al. (2005) discuss the challenges democratic governments face during crises and find that the decision-making processes are often slowed due to the need for consensus and considering legal and ethical standards. In such situations, democratic governments should have legal frameworks for adopting more assertive measures to respond quickly and control the crisis.

The UK has a legal framework for emergencies that authorises the government to take special measures. These measures may include restricting civil liberties, centralising resource allocation, and enhancing monitoring and supervision. While these measures are usually

temporary, they empower the government with greater authority and tendencies towards centralisation during crises.

The development and promotion of the NCA are supported by corresponding legal frameworks. Sections 34, 35, 39, and 42 of the Data Protection Act 2018 stipulate standards for the handling and protection of personal data (Legislation.gov.uk, 2018). During health emergencies, the government needs to ensure that the data collection and processing measures comply with legal requirements, respect personal privacy rights, and safeguard public health and safety. The Health Protection (Coronavirus) Regulations 2020 were emergency regulations enacted in response to the COVID-19 pandemic (Legislation.gov.uk, 2020). They empower the government to take various measures, such as restricting movement, closing businesses and public places, implementing isolation and mandatory quarantine, and enhancing monitoring and management of the pandemic.

10.1.4.2 Efficacy Brought by China's Authoritarian Mode

China, on the other hand, possesses strong technological capabilities and mature infrastructure in information technology and data management. In the early stages of the COVID-19 outbreak, the Chinese government swiftly integrated existing technologies such as artificial intelligence, big data analytics, and cloud computing to develop and implement the HCS. The rapid application of these technologies provided strong data support and real-time monitoring capabilities to the Chinese government, aiding precise control of the virus spread. The state's unique real-name registration system requires citizens to use genuine identity information for various services, enabling the government to integrate and manage data based on reliable personal identities during the pandemic.

Integration with the real-name registration data results in accurate information generation based on the HCS, strengthening the practicality and the credibility of the system. In general, China's HCS is based on a data system that is already mature. Chinese culture is also very accepting of collectivism and stability in society. Texts accumulated indicate that the public had high levels of cooperation and support during sudden public health crises. This social acceptance and supportive nature towards the HCS enabled the government to quickly deploy and universally adopt the HCS nationwide.

While authoritarianism undoubtedly carries negative connotations, from a culturally and ideologically neutral perspective, this concept may not necessarily appear excessively negative. Because the fast and precise deployment of resources and centralised population

control can indeed break the virus transmission chain in flare-ups across regions (Cheihub et al., 2020). This efficiency is evident in the use of digital surveillance tools and mandatory quarantine measures in China, where public resistance is little due to the political system's nature (Ang, 2020). Conversely. democratic systems' complex decision-making process and scepticism toward government actions among the public could create hurdles when pandemic control solutions need to be carried out emergently (Gostin et al., 2020). In the early stage of the pandemic, many democratic countries faced delays in implementing lockdowns and securing personal protective equipment due to bureaucratic hurdles and debates over individual rights and economic impacts (Greer et al., 2020).

10.2 Differences

10.2.1 Normalisation of Surveillance vs. Avoiding Talking about Surveillance

In the previous part, I briefly mentioned that the normalisation of surveillance in China's context is due to the accustomed surveillance culture. Here, I specifically focus on the differences between the normalisation of surveillance and the avoidance of surveillance in each country's promotion of contact tracing apps.

In Chapter 2, I explained that China has a high density of CCTV coverage, and big data analysis and facial recognition are used in various daily life scenarios, including but not limited to mobile payments, public security, transportation, education, electronic entertainment, and smart home systems. These technologies have received government funding and support, while public support also greatly contributed to their prosperity. According to a survey conducted by the Guanghua School of Management at Peking University, Chinese people have the highest acceptance of facial recognition (GSM.PKU, 2020). As a result, facial recognition technology, as an advanced tool that can enhance surveillance capabilities, has been applied to the HCS' verification process and its supporting devices, such as Hanwang s Digital Sentinel. In this context, the government does not need to worry about potential opposition when promoting the use of the HCS.

Additionally, China's surveillance technology is also used to control speech on social media. Research by Chen (2022) shows that Chinese citizens have a tendency towards self-censorship in a strictly controlled online environment. In such an environment, it is undeniable that positive public opinion about the HCS and related surveillance devices is likely filtered. As people are exposed to an environment lacking dissenting opinions for a

long time, they may unconsciously accept and become accustomed to a lifestyle under intensive surveillance activities.

The UK also has a strong national surveillance system, as explained in Chapter 2. However, the cautiousness exhibited by the UK government when promoting the NCA and the COVID-Pass is fundamentally a result of many complex factors, including the surveillance culture in a liberal democratic society, the relevant legal framework, and decreased public trust due to past controversial events. Pressure from human rights and privacy organisations also led the government and the NHS to design the epidemic control software with minimal surveillance features, in order to rebuild and maintain public trust. Consequently, the UK government and the NHS abandoned the initial centralised model and repeatedly emphasised that the app only "tracks the virus, not people".

10.2.2 Authoritarian Communication vs. Liberal Democratic Communication

China's commanding tone also matches the internal logic of the HCS discourse itself. In the PDA, it is found that the system is repeatedly positioned as a condition for ordinary life. It turns into a "passport" for work, study and travel. This makes compliance the base for social membership. Where normal access is reliant on this code status, communication can become directive, as the policy, itself, is already designed as a gatekeeping infrastructure.

This mode is fuelled by technocratic and legal rhetoric. Legitimacy in the Chinese texts is typically framed in terms of system capability, shared criteria or procedural legality. Official debates around privacy issues appear late and mainly function as a managerial requirement to meet management needs. It is phrased through authorisation, "qualified" performers and compliance with regulations. That manoeuvre moves the debate away from whether massive tracking should be allowed. It keeps conversation inside the structure as an issue of the proper operation of the system. The result is to reduce public contestation. Policy becomes a technical necessity; disagreement can be recast as misunderstanding or non-cooperation.

In the UK corpus, a different risk is foregrounded. The main governance problem is uptake. Contact tracing requires voluntary participation in order to succeed. That is, structurally, a way to persuade. It also explains why privacy and security terminology are used as a marketing tool in the NCA materials. They are not just legal obligations. They are trust-making devices, designed to keep the app inside a liberal moral economy of consent, proportionality and time-limited emergency measures. In this respect, "gentle"

communication is tactical, which handles anticipated resistance by portraying surveillance as bounded, contingent and privacy-preserving.

Yet at the same time, this contrast should be read critically. The UK's softer tone does not remove the question of power. It changes the way that power is wielded. Responsibility language places people in charge of managing risk, even when policy choices and systems design sit with the state and its technical partners. This fits into one of the logic of governmentality. Conduct is moulded on the basis of counsel, risk warning and moral duty, and less outright coercion. Consequently, both styles aim at compliance, but operate through different paths of legitimation. The way that China does it is through hierarchical command and infrastructural gatekeeping, whilst the UK uses trust, consent-based rhetoric and privacy-focused-design to achieve it.

According to Williams et al. (2020), the focus group study based in the UK in July 2020 suggested that many participants have serious concerns over their privacy regarding contact tracing apps, which affected their willingness to download as well as to use them. As the commissioner for biometrics explained, symptom-tracking applications can even be transformed into things like mass surveillance devices. Those issues were certainly predictable and met at the outset when creating the NCA. For example, the digital contact tracer was developed with decentralised data gathering and promised not to track users' home locations, as a way to lessen public apprehensions of surveillance. Given that the NCA was as "de-surveilled" as possible with sophisticated-designed privacy and data protection processes, decentralised mode of use, the government and NHS would have to feel reassured to adopt a more gentle mode of promotion to avoid public resentment, resistance and increasing acceptance (Florian et al., 2022).

10.2.3 Standards of Privacy

The differences in privacy standards have led the governments of both countries to adopt entirely different strategies in designing disease surveillance systems, which in turn affect the rhetoric used in implementing these smartphone applications. As noted earlier, I observed that China's unique concept of privacy has contributed to the intrusive nature of the HCS in accessing personal data. Interestingly, the multinational survey by Peking University's Guanghua School of Management (2020) indicates that Chinese citizens are actually the most concerned about privacy issues, though not necessarily the most worried. The survey results show that 60.5% of respondents consider privacy to be "extremely important." Their

concerns stem primarily from fears of information leakage and misuse, which could impact personal and data asset security, as well as disrupt daily life. However, compared to other nationalities, Chinese citizens are least concerned about using personal information to assist public decision-making. The survey assumes this may be linked to the practical security assurances Chinese citizens gained from using personal information in epidemic prevention and control.

In the Chinese corpus, this type of assurance is primarily communicated through administrative confidence, not through detailed privacy guarantees. Privacy protection is rarely articulated as a rights-based boundary. It is seldom mentioned as a rights-based boundary and is only referred to in abstract managerial terms. For instance, in [G5-CN-Text 9 & 10], privacy is mentioned through legality, voluntariness, and prevention of misuse, but fails to provide context when discussing specific operational aspects of the data, including storage location, retention periods, independent audits, and remedial mechanisms. Here, it is important to note that, in China, the HCS's data were managed at the local government level, and it was performed through hybrid governance. Although the formal authority was held within municipal and provincial governments, data collection, processing, and the operationalisation of the system were heavily dependent on third-party platforms, primarily Alipay (Ant Group) and WeChat (Tencent), with cloud infrastructure which provided support for that system. This is consistent with the PDA finding that privacy is treated as an internal parameter of governance and not as an externally imposed constraint that could redefine system scope.

Other Chinese samples are designed to normalise exposure through behavioural gatekeeping. The HCS is depicted as a "passport" for work, study, and daily life in [G3-CN-Text 5]. This language presumes that digital visibility is the entry point into normality. It also makes privacy subordinate to access. The language of "one person, one code," rapid verification, and "precise control" portrays intensive data processing as a routine administrative tool. The outcome is a discursive standard for privacy resting on state competence and technical effectiveness, which permits little discursive space for rejection, grievances, or examination of data practices.

In Chapter 6, I have mentioned in section 6.3 that incidents such as the data breach by Cambridge Analytica and the WannaCry attack indicate privacy issues that differ greatly among Britons and those common in China, largely relating to personal liberty and private

life. Essentially, the UK's judgment of privacy, as different from that of China, emerges from a culture of opposition and aversion to governmental authority. Chapter 4 explains that the private space is the legacy of a chain reaction of events from the capital revolution and privatisation. British privacy approaches concentrate on safeguarding personal freedom and private life protection in the context of growing use of information technology and data security risks in the digital era.

Differing concepts of privacy could also affect the approaches and methods governments take towards the design and use of contact tracing as governments develop and incentivise the construction and promotion of contact tracing applications. In China, the HCS, at its core a mechanism of massive data collection and centralised control, is promoted by the government with great rigour and centralisation. China's authoritarianism and prioritisation of public safety allow the government to quickly push for the use of these technological tools in managing health crises and to compel the use of these tools in health emergencies. The UK government is comparatively democratic and transparent, placing its values on individual freedom of choice, free from coercion and relying on safeguarding privacy rights. Therefore, the NCA is based on user privacy protection and data security. This style respects the public privacy rights and refrains from overcentralisation or the implementation of mandatory data collection, thus increasing public confidence and adoption of such solutions. Thus, the different privacy concepts can help shape the technological responses governments might implement to prevent and manage epidemics and public health.

10.2.4 Affective Governance and Empathy in Biosecuritisation

Another difference concerns the role of empathy and psychological experience in official communication. This matters because biosecuritisation is not simply ruled and implemented through tools. It also depends on the affect, which relies on how fear, reassurance, gratitude, guilt, endurance, etc., are organised in language. In each of these cases, emotional vocabulary acts as a governance tool. However, the corpus points to different emphases, different omissions and different moral obligations. This affective layer also connects biosecuritisation to broader surveillance cultures because legitimacy is upheld through felt experiences of safety, threat, and duty, and not just through legal or technical claims (Lyon, 2018; Wienroth et al., 2020).

In the Chinese corpus, the main affective advocacy is collective endurance. Officials praise discipline, sacrifice and obedience as virtues associated with national survival. Citizens are

placed in a mobilised public body whose role is to obey and act. This fosters a moral atmosphere where suffering only becomes meaningful in the service of the collective. Meanwhile, it also restricts access to those moments of internal fragility. In Chapter 9, it already shows a substantial absence of discourse: there is no sustained treatment of anxiety, stigma, exhaustion, or dignity within colour-coded life despite the HCS shaping work, movement, and social participation. Fear of "turning red," social labelling, and everyday stress still lie beyond the official narrative. This silence, itself, is political. It shrinks down what is a real public concern. Emotional experience turns into private trouble while public discourse becomes about confidence, unity, and resilience. Empathy is thin in its shape. Mostly, it offers paternalistic reassurance as the state speaks like a guardian. Citizens seem to be subjects to be protected and managed, not rights-bearing people whose distress could change the course of policy choices. This is consistent with a biosecuritised security framing that privileges threat control and social order, while treating psychosocial harm as secondary to operational success (Wienroth et al., 2020; Zhang, 2022).

In the UK corpus, though, empathy is more manifest and more rhetorically active. Johnson's speeches always recognise hardship and disruption, and they not only provide guidance and advice. This is in keeping with one communicative style that is liberal-democratic-dependent on the consent of the public and the maintenance of cooperation. The emotional register is supportive of a model of voluntary compliance that the public is invoked as moral agents who suffer restrictions for others. This pattern is seen across biosecuritisation texts that promote uptake of the NCA. Appeals to protect family members and the NHS provide a way of translating risk management into daily moral care. In this scenario, empathy carries this practical function. It helps keep coercive measures consistent with a self-image of liberal governing. It also assists in making compliance not only compliance into a morally felt, ethically owned by the citizen choice, but even if the broader crisis architecture and policy design is still state-administered. Repeated stress on privacy, voluntariness and time limitation also functions affectively, since these serve to reduce unease and sustain trust as a condition of participation (EDPB, 2020; Morley et al., 2020)

Nevertheless, this contrast should be read critically. Empathy in the UK does not wash away power. It facilitates the acceptance of power more easily. Therefore, compassionate language softens the impact of laws against you while maintaining targets. In this way, empathetic language can soften any negative impact felt by an individual suffering from control whilst remaining in their behavioural targets. In the UK texts, a supportive language can dilute the

severity of sanctions. More particularly, it can shift the responsibility down. When the moral responsibility and care for others undergirding the political process are met by citizens, refusal becomes a difficult-to-articulate position. It risks being seen as selfishness and civic failure. Moral pressure in China is more specific and enhanced by infrastructural gatekeeping by the HCS. In the UK, the pressure is not so much a personal one and rather more affective and discursive. It works through calls on decency, solidarity and responsible self-management. Both approaches shape conduct. They come in different styles, but they share a basic logic that the use of emotional language works to stabilise compliance and thus to maintain the legitimacy of emergency digital governance. Moreover, this stabilisation is infrastructural as well. As participation becomes routine, systems can fold individuals into broader data practices that extend beyond any single app, consistent with the logic of the surveillant assemblage (Haggerty and Ericson, 2000).

Consequently, empathy is part of governmentality in both corpora. It bolsters self-regulation and lends the sense that biosecuritisation serves a social function. The main difference is distribution. China foregrounds heroic collectivism and does not adequately address its psychosocial costs. The UK emphasises reassurance and acknowledgement of hardship, as it empowers participants to remain engaged in a system of risk surveillance and behavioural guidance despite still being grounded in empathy. This is the point at which Deleuze's idea of the control society becomes especially relevant. Control operates via continuous modulation, feedback, and conditional access in subjects who adjust behaviour in response to signals (Deleuze, 1992). In pandemic biosecuritisation, affect plays an active role in keeping these feedback loops working. Anxiety, reassurance, and moral care can increase responsiveness to alerts, guidance, and permissions, allowing behaviour to be adjusted continuously and immediately in response to system signals. In that sense, the UK case can be read as a cybernetic form of self-regulation that fits neoliberal governance styles, since the system encourages individuals to treat risk management as a personal obligation and to internalise ongoing monitoring as responsible citizenship. The Chinese case also contains feedback and modulation, but it is anchored more heavily in enforced gatekeeping and collective discipline, therefore, emotional language supports compliance inside a tighter infrastructure of permissions and constraints. These dynamics matter even when effectiveness claims are strong. Epidemiological evaluations of the NCA can support the public health rationale (Wymant et al., 2021), yet the key point here is that affective governance helps keep

participation stable, keeps critique manageable, and allows biosecuritisation to settle into everyday life as a normal form of digital rule (Lyon, 2018; Wienroth et al., 2020)

10.3 Discussion

10.3.1 Governmentality, Biopolitics and the Society of Control in Biosecuritisation

10.3.1.1 Governmentality

In Chapter 3, I introduced Foucault's concept of governmentality, which shifts the focus from traditional governance, emphasising tools and processes, to how governments shape conditions that encourage individuals to act according to state objectives. This concept provides a theoretical framework to understand how modern states manage populations and secure the welfare of their citizens through various means. It can be applied to the promotion and implementation of digital contact tracing apps during the COVID-19 crisis.

Johnson's two speeches, the promotion of the COVID-Pass and the NCA, adopted a gentle communication style characterised by its explanation of privacy solutions and the emphasis on voluntariness and citizen responsibility. Meanwhile, the UK government and NHS encourage citizens to download and use the app by appealing to their sense of responsibility and community welfare. For instance, using the idea of "protecting themselves and their loved ones." These can be an example of Foucauldian governmentality, which seeks to make individuals act in their interest within the agenda set by the state. It also reflects the concept of governing at a distance, where individuals are regarded as autonomous bodies who self-regulate in response to calculated inducements from the state.

The discourse, in Foucauldian terminology, functions through "conduct of conduct". It creates a field of action in which people are self-governed by direction, reminders, and risk communication, while the state presides in shaping the agenda. The key is to get people to define what they would find reasonable behaviour, and then to ensure it feels like adherence is patently self-evident. This thinking is also reinforced by the language of the app. It conceptualises public health as a matter of behavioural tuning via alerts and exposure notifications while treating behavioural health as a problem of self-calibration. The governing at a distance is therefore grounded in task activation through app-mediated commands that translate disease risk to the task and micro-actions at hand.

At the same time, this governmentality is conditional. Voluntariness acts as a legitimacy resource, but the discourse closes the gap of refusal via moral pressure and social expectation.

Participating in the Test and Trace programme is consistently linked to ensuring community protection. Refusal in this condition can be understood as an appropriate position; it is more likely to be read as irresponsibility. Now it is a subtle disciplining force that people, who are still ostensibly free, have less say in the social setting that magnifies the reputational and ethical cost of dropping out.

Another layer also comes from the authority of the technocratic. The UK corpus repeatedly roots decisions in data on infections, modelling and system performance, enabling intervention to be framed as an expert need. Governmentality here is combined with technocracy, which the state rules via metrics and a properly designed framework. This transforms political contestation into questions of effectiveness and compliance. Privacy is consistently portrayed as an engineered feature, backed up by a series of security tests such as anonymisation and data minimisation. This moves public judgment toward whether the tool is sound and reliable, rather than grappling with questions of how extensive digital surveillance can be in a liberal democracy.

The Biometrics Commissioner's intervention adds a touch of government oversight discourse. He assesses new surveillance proposals based on need and time limits. This reinforces liberal self-description, but it can also entrench surveillance as an acceptable form of policy once it is enveloped in the "correct" processes. Oversight now constitutes a prerequisite for perpetuation, and the baseline assumption becomes one of managed permissibility.

Therefore, the UK corpus presents governmentality as a kind of soft architecture of power. It depends on voluntariness and talk of responsibility, underpinned by technocratic reassurance and procedural review, in order to gain cooperation and present app-enabled monitoring as regular and civic-minded.

10.3.1.2 Biopolitics

Here, I briefly recap the concept of biopolitics introduced in Chapter 5. Biopolitics involves certain types of power that take the lives of populations as their object. This concept is a significant element of governmentality, which refers to the regulation of populations through the control of biological aspects of life, such as health, reproduction, and mortality. This form of power is concerned with managing life and populations rather than merely disciplining individuals.

China's HCS is a typical instance of this intensified biopolitical construct. It is an algorithmic system that manages health administratively through categorisation. Big data infrastructures and biometric verification support a system that assigns differential permissions through colour codes. Under this condition, digital legibility mediates access to work, travel, and everyday spaces. Therefore, the system does more than just monitor health. It generates a population map of risk and compliance. It distributes freedoms and restrictions in real time, and makes the management of disease inseparable from the management of social order. This enables collective safety, but it also expands the state's ability to normalise surveillance as part of daily governance, while privacy and contestation remain marginal within official discourse.

The UK engaged in biopolitics as well, yet in a different format. Pandemic governance had relied upon epidemiological indicators, modelling, and population-level targets to justify lockdowns, reopening, and behavioural guidance (e.g., Johnson's repeated use of infection data to make decisions in [G1-UK Text 1 & 2]). The NCA takes a similar logic into daily lives. Risk is operationalised through exposure notifications, isolation guidance, and system updates that aim to shape behaviour at scale. The biopolitical object is still the population, though, and governed by liberal-compatible means, such as voluntariness claims, the language of privacy-focused design, and responsibilisation. It does not eliminate coercion; it displaces it. Compliance is incentivised by civic duty and moral pressure, and supported by legal powers and institutional procedures.

10.3.1.3 Society of Control

Deleuze's notion of a society of control evolved from but also deviated from Foucault's work on disciplinary power. Whereas disciplinary societies function in closed institutions, such as schools, factories, hospitals, and prisons, societies of control operate via constant modulation. The exercise of power is no longer predicated on static borders and sporadic sanctions. Instead, it comes by flexible, networked systems that continually adjust, monitor and steer behaviour. For the latter, digital technology has been central as it makes data, constant observation, and automated intervention possible.

This logic is readily apparent in the deployment of digital contact tracing technologies across the COVID-19 pandemic. In both cases, the UK's NCA and China's HCS showcase how population management is now coming to be a matter of continuous data flows that are implemented discretely in response to events. Control in both cases is exercised through

infrastructures that exist steadily in the background. These systems do not just record behaviour. They actively shape it. They do so by providing systems of access, mobility, and social participation that structure.

One of the main outcomes from the early Test and Trace programme was a combination of traditional administrative coordination and emerging control mechanisms. Human contact tracers worked together at testing centres and health authorities within a centralised system. This model was still based on identifiable institutional actors and direct intervention. Yet the rollout of the NCA represented a move to an automated and more decentralised approach to control. Bluetooth proximity detection enables data to be continuously produced at the level of individual devices. Individuals are no longer human beings seeing or listening to exposure notifications, risk alerts, or isolation guidance. Behaviour is shaped by persistent signals and feedback loops. They are advised to self-monitor, self-isolate and alter daily routines in response to risk assessments generated by the app.

While the UK app is promoted as voluntary and privacy-preserving, its production closely parallels Deleuze's account of control through modulation. Risk is never completely resolved. It is constantly updated. Access to normality is contingent on being under certain acceptable thresholds around data-driven safety. More generally, the app operates in that governance framework in which freedom is conditional, which is constantly worked with and worked through by digital metrics. The state may be indirectly at work, but its authority is written into the building of the system, the risk threshold and the behavioural demands brought on by notifications. Power, therefore, is exercised in terms of infrastructure and information architecture.

China's HCS is a more explicit and intense form of control, but that has the same underlying logic. Colour-coded QR statuses determine access to transport, workplaces, residential areas and public services. It collects data continuously and through multiple sources. A summary of health status, travel history and proximity yields an ever-adapted risk assessment. Control here is immediate and visible. Real-time is allowed or not allowed for movement.

In each, power is shared between multiple actors and systems. Government agencies, public health authorities, technology platforms, and algorithmic infrastructures all participate in governance. This diffusion of power makes control less about domination from a single power structure and more about technical compulsion hidden within the day-to-day operations we see in the fabric of daily activities. Responsibility is also shared among the

various components of authority and institutions. Individuals are, therefore, expected to obey, self-correct, self-regulate, and appropriately respond to the signals created by the system.

Crucially, these control mechanisms do not suspend liberal or authoritarian logics; they redistribute them. Control in the UK is softened with voluntariness claims, privacy language, and calls to responsibility. In China, it has been naturalised through collectivist stories, administrative efficiencies, and paternalistic power. Yet despite these dichotomies, both systems illustrate how digital governance moves the geography of power across regions. Control becomes continuous, adaptive and hard to challenge. Surveillance is no longer a unique act. It turns into an ordinary state of engagement in social life.

The pandemic thus speeds up a wider transformation in governance. Data, interfaces, and risk calculations are used to control. It is conducted via everyday devices and daily interactions. In this way, COVID-19 contact tracing technologies do not only react to a crisis. They are yet another example of a structural transition towards societies organised around the constant digital manipulation of behaviour in which freedom, access and security are guided via systems that remain active all the time.

10.3.2 Repackaging of Surveillance

The main difference between the Chinese and UK corpora appears in how surveillance becomes speakable and acceptable in pandemic communication. The issue is not only about how much surveillance is deployed, but how the practice is rhetorically reclassified so that it fits into the frame of existing political culture. In both cases, the digital contact tracers are rarely referred to as "surveillance". It is translated into other moral and administrative terms, such as protection, care, security, responsibility, and efficiency. This is a typical instance of legitimation that is achieved by linguistic substitution. Surveillance is not denied in practice. It is reformulated to become more acceptable.

In the UK corpus, repackaging is primarily accomplished by a liberal narrative of consent and privacy-protective design. Anonymity, data minimisation, and technical limitations are repeatedly emphasised to make monitoring seem limited and reversible. This accords with Lyon's argument that surveillance nowadays tends to appear as routine and service-driven, embedded in ordinary infrastructures and framed by comforting cultural narratives (Lyon, 2007; Lyon, 2018). The promotional language also reduces public concern. It comes down to whether the system is safe and accurate, more than whether massive digital surveillance should eventually become a tool of public governance.

Voluntariness functions as a moral requirement. In the UK, it presents participation as a matter of individual free choice, even when the broader context elicits social pressure to comply. This creates a political transformation in the cause of concern. Instead of challenging surveillance as power, the communications encourage trust in the good design as something that is engineered into the product. It is depoliticised through technocratic reassurance.

In the Chinese corpus, repackaging acts through a different route. The concept of surveillance is normalised through administrative trust, collective duty, and the hope for precision governance. The HCS is communicated as an instrument of social order and of safe mobility, not as an exceptional measure. This is consistent with a Foucauldian concept of governmentality that sees contemporary governance as working via problem-solving and control over everyday life processes, which treats health and mobility as objects to be kept watched, measured, and regulated (Foucault, 1991; Foucault, 2008). When governance is characterised as precision control and system optimisation, then surveillance becomes a technical imperative in a society's management. Ethical issues are filtered down to system management terms and procedure compliance. The political issue of legitimacy is trumped by operational efficacy. It is this displacement which also ties into Amoore's (2013) analysis of risk governance, in which security logics classify groups in advance, translating the political into the risk calculation and technical measure. In short, surveillance is sold as the scientific route to safety and moral legitimacy is packaged under the assurance of stability and a promise of public protection.

In both cases, the process of repackaging can be understood through Deleuze's concept of a society of control. Pandemic monitoring is designed as an ongoing system of signals and permissions. There are continuous updates, scores, alerts, and code statuses that all provide control over access and movement (Deleuze, 1992). In China, this is manifested as code-based gatekeeping connected to common access points. In the UK, it is in a softer shape in notifications and risk messages, app-facilitated behavioural guidance. The top-line rhetoric may vary, but the reasoning shares similar points. Both systems embrace a governance model that is entrenched in data-driven, cyclical adjustment, with this adjustment framed as routine administration in both systems. Surveillance is thus repackaged as a standard precondition of safe involvement in society, and the politics of monitoring becomes harder to name as politics.

10.3.3 Long-term Impacts on Government and Citizens' Relations to Biosecuritsation

10.3.2.1 The UK Aspect

Population management and surveillance scale can be enhanced by technological change, and technology can serve to help state power expansion. For the UK, the democratic system has a certain flexibility to adjust and adapt to emergencies as needed. This flexibility means that democratic countries can temporarily adopt more centralised decision-making models in specific situations without completely abandoning their fundamental principles. In the UK context, this may also be related to the ruling political party of the time. In past crisis management, if strict monitoring measures have proven effective, the Conservative government may be more inclined to employ such measures again during the COVID-19 pandemic. For instance, in addressing other national security issues like terrorism threats, the Conservative government tends to implement robust surveillance measures. A notable example is during the 2011 London riots, the Conservative government extensively used CCTV surveillance and communication data analytics to identify and apprehend rioters (Ratcliff, 2013). The Investigatory Powers Act 2016, proposed by the Conservative government, also shows its necessity and importance in combating terrorism and serious crime.

Therefore, the Conservative government has a tradition of developing and using surveillance technologies. However, this approach inevitably brings broader surveillance coverage, especially in the rapidly advancing biometric surveillance technology environment. The enhanced data collection and analysis capabilities strengthened by the UK government during COVID-19 may lay the groundwork for handling similar crises in the future, while also providing technological support in other areas such as public safety and counter-terrorism. From policymakers to the public, the acceptance and application of these technologies may play a crucial role in future public policies and legal frameworks. For instance, in the future, if the country faces a significant number of potential terrorist suspects lurking within the population, to the extent that it becomes necessary to find an effective way to protect public safety, the government may consider developing a software similar to the NCA, integrating future updates of technology combined with chip technology in the Biometric Residence Permit card, to help the public avoid danger.

In recent policy directions, it seems that this path can extend beyond emergency health governance into more permanent forms of digital identification and verification. For instance, Keir Starmer's Labour government is considering the introduction of a national digital

identity system (in the form of a provisionally given "BritCard" that people save on their smartphones through a government-controlled digital wallet that can be verified by employers, landlords, banks and immigration authorities) (The Guardian, 2025). Officially, as a means of efficiency, security and fraud prevention, such proposals also show how emergency managed infrastructures can become mobilised for wider population management. The logic of the NCA (voluntary participation, digital verification, and decentralised data control) finds particular support in this digital ID discourse that is growing on this front. This continuity suggests that the mass surveillance logic learnt from biosecuritisation practices used in exceptional situations may become part of normal governance.

From a critical perspective, however, this sort of technological approach also brings ethical and legal challenges regarding personal freedoms and privacy protection. While participation in mechanisms like the NCA or future digital identification schemes may be officially voluntary, social and administrative reliance on digital verification can gradually limit the open-ended space for refusal. Over time, employment, housing, movement, and public services might increasingly be mediated by digital credentials. This could convert consent from a conscious choice into a tacit demand for participation, even under a liberal-democratic structure.

This sort of technological approach also brings ethical and legal challenges regarding personal freedoms and privacy protection. British society may start to accept and adapt to these technologies while striving to find a balance in protecting individual rights and freedoms. Therefore, the challenges the UK government faces in terms of biosecuritisation strategy involve finding an appropriate balance between technological advancement and public engagement to ensure effective crisis response while ensuring personal privacy and data security.

10.3.2.2 China's Aspect

For China, in the context of unilateral government directives to the public, the unlimited expansion of government power could ultimately lead to an eruption of public discontent and rage. The White Paper Movement, which occurred at the end of 2022 in against the zero-COVID policy, is a consequence of such unlimited power expansion (Amnesty International, 2023). The HCS, as a tool of mass bio-surveillance, was an indispensable means to support the zero-COVID policy. From this, it is evident that excessive lockdown management

achieved through surveillance technology inevitably infringes upon human rights and freedoms, potentially leading to unforeseen humanitarian crises.

The cause of the White Paper Movement was at least 10 people trapped in an apartment in Urumuqi due to strict lockdown measures, unable to escape a fire that resulted in death (Amnesty International, 2023). Additionally, in Xi'an City, multiple pregnant women and critically ill patients were denied hospital treatment for not presenting a valid "green code", leading to miscarriages and even deaths. Some Chinese social media users began mocking Xi'an's extreme epidemic prevention measures against the virus, stating "In Xi'an, you can starve to death, you can die of illness, but you cannot die of COVID" (BBC, 2022). Human beings, regardless of their social and political environment, have a natural inclination towards pursuing human rights and freedoms. Strict epidemic control policies and the mandatory implementation of surveillance systems are bound to bring about humanitarian crises.

After three years of the zero COVID policy, the Chinese government discontinued the HCS on February 16, 2023. Hu Chengzhong, a National People's Congress representative, told the China Newsweek (2023) that widespread concerns about the HCS primarily revolved around the opaque coding rules and data security issues. He recommended that all levels of Health Code data across the country should be systematically reviewed and permanently deleted. This demonstrates that the HCS over these three years exposed significant flaws in the authoritarian system, resulting in a series of serious negative issues. In the future, when China faces similar crises, collective memories among the people may no longer support the government's hard-line measures, potentially posing obstacles to China's future risk management.

Chapter Conclusion

This chapter's comparison and discussion reveal several insights into how China and the UK employed different communication strategies to implement digital contact tracing technologies during the COVID-19 pandemic. Several key conclusions can be drawn about the similarities and differences I found.

For the similarities, it is concluded that, despite sharp differences in political culture, China and the UK have converged on similar biosecuritisation logics during the pandemic. In both contexts, public health urgency legitimised expanded surveillance, and technocratic rationalities reframed governance as optimisation and risk management. The modes of exercising authority were different in terms of the style of communication, yet both models

normalised data-driven population control. This convergence suggests that crisis conditions compress ideological differences and enable surveillance infrastructures to become durable features of governance beyond the emergency.

For the differences, these contrasts demonstrate that biosecuritisation in China and the UK derives from different cultural, political and communicative logics, yet both ultimately seek to ensure compliance of the population in crisis. In China, surveillance is openly normalised and embedded into everyday infrastructure, while authoritarian communication, technocratic legitimacy and an administrative trust and collective stability-based privacy standard facilitate its routine. Emotional governance operates on the premise of endurance, sacrifice, and obedience, while the psychosocial costs remain largely unacknowledged. The UK avoids explicit surveillance language and employs liberal-democratic communication strategies emphasising consent, privacy, empathy, and individual responsibility. Nevertheless, softer rhetoric does not diminish this power; it redistributes it through affective appeals, moral obligation, and self-regulation. Across both contexts, surveillance is legitimised by different discursive routes, indicating how political systems adapt biosecuritisation to fit local norms while converging on similar outcomes of behavioural control and compliance.

Through discussion, now we can see that biosecuritisation serves both corpora as a type of political technology of conduct. It translates crisis governance into everyday self-management, technological metrics, and routine compliance.

Governmentality is evident in how responsibility, risk communication, and voluntary participation are mobilised to carry out the work of control. Biopolitics then fixes health as a population problem, turning movement, contact, and exposure into objects of calculation and intervention. In Deleuzian terms, the consequence is a control logic that works through continuous signals, permissions, and data updates; thus, governance becomes ongoing modulation.

Repackaging is central to making this acceptable. Linguistically, surveillance is displaced into care, protection, efficiency, and security. This narrows the space for contestation because critique must first break the frame of the public health service before it can name power.

The long-term consequences are not the same in each case. In the UK, emergency infrastructures and "trust-making" rhetoric can sediment into routine digital verification, quietly tightening the practical costs of refusal. In China, the HCS exposes how coercive

biosecuritisation can trigger legitimacy crises when harms accumulate and coding rules remain opaque.

Conclusion

10.1 Recap of the Research Purpose and Questions

This thesis has investigated the governments' discursive role in different political and societal contexts to promote digital and biometric surveillance technologies for pandemic control. Specifically, it sought to analyse how political ideologies and cultural values influence the framing and implementation of such technologies, focusing on a comparative study between China and the UK during the COVID-19 pandemic.

The thesis was guided by the central question: *How have digital and biometric surveillance tools been promoted and justified during the COVID-19 crisis?*, and three subsequent questions: 1) How are political and social values utilised in communication when promoting digital and biometric surveillance products? 2) How cultural paradigms shape digital surveillance varies across different cultures and histories, influencing both its acceptance and implementation. 3) How a society of control is formed under different cultural, societal, and political contexts.

The primary aim was to discover the complex dynamics between state power, public health measures, and individual liberties, as well as to understand the long-term implications of the normalisation of surveillance technologies as governance tools.

10.2 Recaps of Findings and Discussion

By conducting PDA and CDA with a DHA framework, this thesis examined official communications relevant to the promotion of China's HCS and the UK's NCA.

10.2.1 The HCS

In China, the HCS was developed in collaboration with major technology firms such as Alipay, Tencent, and Hanwang Technology. These companies have an affiliate relationship with the government as a technology provider. The system was used to track individuals' movements based on the categorisation of health status and travel history.

The system was implemented and promoted in a top-down, compulsory manner, with a strong emphasis on collective responsibility. Specific legal framework and legal punishment were established as a deterrence to incompliance to strengthen government control. It could be a representation of China's authoritarian governance model while reflecting the state's cultural-ideological tradition in Confucian hierarchical collectivism. However, this approach enabled

the government to arrange and deploy medical resources efficiently across the country's vast territory with a tremendous number of population.

Media and official discourses of the HCS in China was framed around the cultural-ideological values of collective benefits and social stability. The state's control over public discourse and a centralised surveillance mode allowed for the quick and widespread deployment of the surveillance system without potential resistance. Public compliance was essentially ensured through fear-based communication, with the government emphasising the existential threat posed by COVID-19 and framing surveillance as a necessary tool for protecting collective security.

10.2.2 The NCA

In contrast, the UK's NCA was framed as an optional tool aimed at protecting individual health while data privacy and anonymity were maintained within a carefully designed technological framework supported by Apple and Google.

The UK's liberal democratic cultural context led to a decentralised mode of the smartphone application. A consensual agenda-setting mode, which repetitively emphasised voluntariness, was used to convince the public accept this digital solution. The app, with accessible documents of legal frameworks such as the GDPR and technical specifications on the NHS website, shows the government's attitude to building trust through clear communication. However, the UK government still faced significant public scepticism with debates around privacy concerns and the potential for governmental overreach.

10.2.3 Similarities and Differences

The comparison reveals that China and the UK had several structural elements in common when promoting pandemic surveillance, despite drawing different political traditions and surveillance cultures from those described in Chapter 4. In both contexts, official discourse elevated public health into a collective priority and framed participation in digital measures as a form of social responsibility. Pandemic technologies were legitimised as instruments for population defence, instability management and restoration of regular circulation. That is part of a shared logic around biosecuritisation, in which infectious disease is presented as a security risk, raising the stakes on state intervention and making extraordinary responses seem essential and urgent.

Both cases also relied on technological solutionism and technocratic authority. Surveillance infrastructures could be presented as efficient, evidence-based answers to a complex crisis, and expertise, data and platform capacity were seen as key sources of legitimacy. Such a focus can effectively limit public debates. Government power was clear in each instance. Even in participation cases narrated as self-determined, the state imposed risk, expectations, and stabilised acceptable monitoring practices.

The differences are analytically interesting. In the case of China, however, surveillance was openly normalised and embedded explicitly into governance as a matter of administrative practice. Surveillance, categorisation, and mobility control were delivered as the means to maintain order and protect life. Compliance was reinforced through legal duties, infrastructural gatekeeping, and moralised stories about collective responsibility. Official communication in the UK struggled to deal with the moral challenge that Chapter 4 connects liberal political culture to and to the historic fostering of suspicion of state intrusion. The NCA was referenced within a public health rhetorical context, and references that might trigger a "surveillance" frame were softened or avoided. This did not cleanse the system of state power. It reconfigured its public presentation.

These differences coincide with distinct styles of political communication. China's messaging was more directive and disciplinary, including more forceful appeals to unity, duty and sacrifice. The UK's communication depended on persuasion, consent talk and the management of public relations, with transparency claims being a political resource. Privacy standards sharpen the divide. China treated integration and data interoperability as operational necessities and privacy more ambivalently. The UK presented privacy, data minimisation, and safeguards as central to its image; these were part of both design and messaging.

Affective governance also differed. Urgency, threat and the mobilisation of the people became the basis for more Chinese talk. UK discourse depended on comfort, empathy, and trust-building language that reflects a liberal-democratic culture of legitimacy. These patterns show a common biosecuritisation orientation across political systems, alongside major differences in visibility, justification style, privacy framing, and emotional tone.

10.3 Limitations and Suggestions for Future Research

While this research has provided valuable insights into the promotion and acceptance of surveillance technologies in China and the UK, it is important to acknowledge the limitations, especially the scope and depth of its findings.

Firstly, China and the UK represent two distinct political systems. However, while offering a practical comparative framework, these two subjects may not fully capture the global diversity of responses to the pandemic. Other countries, particularly those in different political contexts such as South Korea, Japan, Singapore, or Sweden, might provide additional insights into how various political systems and cultural paradigms influence the adoption of surveillance technologies.

Secondly, my research method, while rigorous in its use of PDA and CDA with DHA as a supportive framework, relied heavily on official discourse and political communications. This focus may have limited the ability to capture the full range of public opinion, particularly from marginalised or dissenting voices that may have yet to be fully represented in official data.

Lastly, I would suggest that future research could benefit from incorporating more qualitative methods, such as surveys, interviews or ethnographic studies, to obtain a more comprehensive array of perspectives on the use of surveillance technologies during the pandemic.

10.4 Contribution

This thesis aims to contribute to surveillance studies and political communication research by specifying how biosecuritisation works as a discursive and institutional project in pandemic governance, and it also demonstrates how this project is legitimised in different political cultures. Biosecuritisation is described as a reassessment of health governance with a safety emphasis, where the acceptable limits of intervention are extended, decision-making and ramping up data practices become normalised through emergency-mediated justification. This logic did not emerge with COVID-19. It extends a longer history of preparedness and security-oriented governance in health systems and technology policy. Across this trajectory, health infrastructures and digital technologies have repeatedly been presented as solutions to risk management and uncertainty. As a result, governance debates tend to focus on efficiency, accuracy, and managerial trust. Critical questions about power, inequality, and political consequence are often sidelined.

A first contribution is conceptual and comparative. The thesis shows that a central structural feature for the promotion of pandemic surveillance in China and the UK shares similarities, even if the political ideology and communication style differ significantly. In both cases, public health is framed as a collective concern, participation as moralised social responsibility, and risk become administratable into categories that formalise access, mobility and compliance. This underpins an argument for a biosecuritisation as a cross-regime governance logic that moves between multiple ideological dialectics, but that maintains a particular security rationale. The comparative analysis then identifies the difference: the presence of surveillance rhetoric, the rhetorical investment in privacy guarantees, and the affective strategies by which compliance takes place.

A second contribution is methodological. Utilising PDA and CDA together, and infused with a discourse-historical sensibility, the thesis constructs government communication not as a transparent statement of state intent, but as mediated, selective, and conditioned by institutional genres and media conditions. This approach is further enhanced by the application of news values theory, which recognises the gatekeeping logics that run pre-agenda-setting. Old and new accounts of news values shed light on how crisis governance is recurrently mediated through the frame of urgency, elite authority, continuity and threat, in fact reducing intricate governance issues to stable and reportable stories.

A third contribution is analytic. Based on surveillance theory, the thesis demonstrates how the tools of the pandemic play a role in surveillant assemblages as transposing bodies into data traces and reconstructing them as administrative artefacts of surveillance, sorting, and intervening. This framing accounts for why political contestation tends to shift to technical domains such as interoperability, thresholds, and system design as governance increasingly moves into infrastructural and algorithmic realms of operation.

A fourth contribution is critical and normative. The thesis articulates how, if couched in the language of protection neutrality, biosecuritisation can also produce unequal social effects. For instance, classification systems rarely share the burden evenly and tend to cross-reference existing social hierarchies, leading to stigma, exclusion, and differential exposure. This insight locates pandemic surveillance within longer critical traditions that connect surveillance to racialisation and social sorting alongside technical work on demographic bias and error patterns in biometric systems.

For all in all, this thesis presents a better-defined model of the legitimation of pandemic surveillance. Biosecuritisation works via a common security logic, though its normalisation relies on culturally based discursive strategies, media conditions and affective registers. This structure enhances the cross-national comparison and results in a more accurate description of the ways in which emergency surveillance becomes permitted, controversial and possibly permanent beyond the crisis.

10.5 Thoughts on Contemporary Biosecuritisation with Control Society and Governmentality

Based on the findings of this thesis, it can be noted that the COVID-19 pandemic has exposed and accelerated the convergence of governmentality and a society of control. China's HCS can be seen as a clear manifestation of what Deleuze and Guattari conceptualised with the idea of the "electronic card," which I introduced in the introduction chapter. This card in their concept serves not only a tool for granting access but a medium for constant modulation in a society where the computer, or surveillance system, has the definite authority to allow or deny access based on preset conditions.

The UK's NCA, although designed within a framework to ensure individual privacy and personal liberty, does not entirely eliminate the characteristics of surveillance. While it is presented as a decentralised health protection tool strictly obeying legal frameworks such as the GDPR and focused on maintaining anonymity, the app still operates within the logic of surveillance in a more subtle form. Its decentralised mechanism may limit the state's direct control over personal data, yet core surveillance functions remain in place. The system still identifies contacts, delivers exposure notifications, and prompts behavioural adjustment. This mode aligns closely with Foucault's concept of governmentality, which describes how modern governance shapes conduct through indirect guidance instead of overt coercion or punishment. During the public health crisis, individuals were encouraged to monitor their own risk and regulate their behaviour accordingly, embedding self-surveillance into everyday practice.

Overall, these manifestations of Deleuze and Foucault's concepts may need to be further discussed in a post COVID-19 global context of biosecuritisation, because technological development and the experience of utilising surveillance tools can potentially cause psychological and behavioural changes in populations, particularly in how individuals perceive their relationship with the state and their own autonomy. The widespread use of

surveillance tools, even in the name of public health, can create a new normal where citizens become more accustomed to monitoring and regulating their own behaviours. However, this may also differ in different experiences of surveillance during the pandemic. For example, the Chinese government's strict surveillance and control have led to a series of humanitarian issues. In this context, even citizens who have become accustomed to normalised surveillance activities may be resistant to other forms of surveillance, such as facial recognition cameras, in their daily lives.

Group 1 – Statements from national leaders

[G1-UK-Text 1] *Prime Minister's statement on coronavirus (COVID-19): 16 December 2020*

From: Prime Minister's Office, 10 Downing Street and The Rt Hon Boris Johnson

Published 16 December 2020

Confrontation

[1] It is just a week since the United Kingdom began the biggest vaccination programme in our history.

[1.1] And the public is coming forward at an extraordinary pace to get a jab, to **protect themselves**, beginning with the elderly and the most vulnerable.

[1.2] With 138,000 recipients of the first dose – and more joining them every minute - there is no doubt we are winning and we will win our long struggle against this virus, which makes it all the more important that we hold our nerve this winter.

[1.3] Because we are now in a race to protect us all while doing everything we can to keep the virus under control.

[1.4] And thanks to the colossal collective effort in November we did bring the R below 1, we did get the infection rate down.

Opening

[2] But I must be frank with you. [2.1] We are already seeing worrying rises in some parts of the country:

Kent is still seeing rising infections.

The number of cases in London is at 270 per 100,000 people.

[2.2] And that's why we acted quickly by moving London into Tier 3 from today.

[2.3] And tomorrow the Health Secretary will announce the outcome of the latest tiering review.

[2.4] And so like every other European country facing similar challenges, we have come to this moment, a great global festival, a turning point, a time of year that is of immense emotional and spiritual importance.

[2.5] But also a moment for us to exercise extreme caution when we must remember that one of the most striking features of this virus is that it spreads invisibly from people who don't even have symptoms, which is in fact around 1 in 3 of everyone infected.

[2.6] And that's why from the beginning this virus has been so hard to fight, and that's why it's so important to follow the rules, and why this Christmas it's vital that everyone exercises the greatest possible personal responsibility.

Argumentation

[3] [Backing] And having looked at the latest data – with our colleagues in the Devolved Administrations, Scotland, Wales and Northern Ireland, we have decided that the overall situation is alas worse and more challenging than we had hoped when we first set the rules.

[3.1] [Rebuttal] So while it would not be right to criminalise people who have made plans and simply want to spend time with their loved ones, we are all collectively across the UK, governments at every level, asking you to think hard and in detail about the days ahead, and whether you can do more to protect yourself and others.

[3.2] [Claim] We are keeping the laws the same – but we all want to send the same message: a smaller Christmas is going to be a safer Christmas, and a shorter Christmas is a safer Christmas.

[3.3] [Qualifier] When we say three households can meet on five days, I want to stress these are maximums, not targets to aim for.

[3.4] [Warrant] And of course it is always going to be safest to minimise the number of people you meet.

[3.5] [Grounds] And that means that if you are visiting others over Christmas, we are asking you – in the five days beforehand, as early as this Friday – to reduce the number of people you are in contact with to the lowest possible, because this virus spreads from human contact.

[3.6] [Grounds] If possible, don't travel from a high prevalence to a low prevalence area and avoid staying away from home overnight if you can.

[3.7] [Backing] Remember, the vaccine is on the way, and our aim is to inoculate everyone who is clinically extremely vulnerable or elderly in the early months of next year.

[3.8] [Grounds] So if you're elderly, the best way to minimise your personal risk is to wait to be vaccinated before spending time indoors with others.

[3.9] [Grounds] And if you have an elderly relative, you might want to delay seeing them until they've been vaccinated.

[3.11] [Grounds] And whatever your plans for Christmas, please think carefully about avoiding crowds in the Boxing Day Sales.

[3.12] [Grounds] And no one should be gathering in large groups to see in the New Year – remember the rules in your local area will apply.

[3.13] [Grounds] In most places across the UK, I'm afraid that means you cannot mix with other households indoors.

Conclusion

[4] All the information about how best to protect yourself and your loved ones is being made available on gov.uk.

[4.1] So have yourselves a merry little Christmas.

[4.2] And I'm afraid this year I do mean little.

[4.3] But with the vaccine, and all the other measures that we are taking, we do know things will be better in this country by Easter.

[4.4] And I'm sure that next year Christmas will be as normal for every family in the country.

[G1-UK-Text 2] *Prime Minister's statement on coronavirus (COVID-19)*

From: Prime Minister's Office, 10 Downing Street and The Rt Hon Boris Johnson

Published 23 March 2020

Confrontatation

[1] Good Evening,

The coronavirus is the biggest threat this country has faced for decades – and this country is not alone.

[1.1] All over the world we are seeing the devastating impact of this invisible killer.

[1.2] And so tonight I want to update you on the latest steps we are taking to fight the disease and what you can do to help.

[1.3] And I want to begin by reminding you why the UK has been taking the approach that we have.

Opening

[2] Without a huge national effort to halt the growth of this virus, there will come a moment when no health service in the world could possibly cope; because there won't be enough ventilators, enough intensive care beds, enough doctors and nurses.

[2.1] And as we have seen elsewhere, in other countries that also have fantastic health care systems, that is the moment of real danger.

[2.2] To put it simply, if too many people become seriously unwell at one time, the NHS will be unable to handle it - meaning more people are likely to die, not just from Coronavirus but from other illnesses as well.

Argumentation

[3] [Claim] So it's vital to slow the spread of the disease.

[3.1] [Warrant] Because that is the way we reduce the number of people needing hospital treatment at any one time, so we can protect the NHS's ability to cope – and save more lives.

[3.2] [Grounds] And that's why we have been asking people to stay at home during this pandemic.

[3.3] [Qualifier] And though huge numbers are complying – and I thank you all – the time has now come for us all to do more.

[4] [Claim] From this evening I must give the British people a very simple instruction – you must stay at home.

[4.1] [Warrant] Because the critical thing we must do is stop the disease spreading between households.

[4.2] [Grounds] That is why people will only be allowed to leave their home for the following very limited purposes: shopping for basic necessities, as infrequently as possible.

[4.3] [Grounds] One form of exercise a day – for example a run, walk, or cycle – alone or with members of your household; any medical need, to provide care or to help a vulnerable person; and travelling to and from work, but only where this is absolutely necessary and cannot be done from home.

[4.4] [Qualifier] That's all – these are the only reasons you should leave your home.

[5] [Grounds] You should not be meeting friends. If your friends ask you to meet, you should say No.

[5.1] [Grounds] You should not be meeting family members who do not live in your home.

[5.2] [Grounds] You should not be going shopping except for essentials like food and medicine – and you should do this as little as you can. And use food delivery services where you can.

[5.3] [Backing] If you don't follow the rules the police will have the powers to enforce them, including through fines and dispersing gatherings.

[5.4] [Backing] To ensure compliance with the Government's instruction to stay at home, we will immediately: close all shops selling non-essential goods, including clothing and electronic stores and other premises including libraries, playgrounds and outdoor gyms, and places of worship; we will stop all gatherings of more than two people in public – excluding people you live with; and we'll stop all social events, including weddings, baptisms and other ceremonies, but excluding funerals.

[5.5] [Backing] Parks will remain open for exercise but gatherings will be dispersed.

[6] [Rebuttal] No Prime Minister wants to enact measures like this.

[6.1] [Rebuttal/Backing] I know the damage that this disruption is doing and will do to people's lives, to their businesses and to their jobs.

[6.2] [Backing] And that's why we have produced a huge and unprecedented programme of support both for workers and for business.

[6.3] [Qualifier] And I can assure you that we will keep these restrictions under constant review. We will look again in three weeks, and relax them if the evidence shows we are able to.

[7] [Qualifier] But at present there are just no easy options. The way ahead is hard, and it is still true that many lives will sadly be lost.

[7.1] [Claim/Backing] And yet it is also true that there is a clear way through.

[7.2] [Backing] Day by day we are strengthening our amazing NHS with 7500 former clinicians now coming back to the service.

[8] [Backing] With the time you buy – by simply staying at home – we are increasing our stocks of equipment.

[8.1] [Backing] We are accelerating our search for treatments.

[8.2] [Backing] We are pioneering work on a vaccine.

[8.3] [Backing] And we are buying millions of testing kits that will enable us to turn the tide on this invisible killer.

Conclusion

[9] I want to thank everyone who is working flat out to beat the virus.

[9.1] Everyone from the supermarket staff to the transport workers to the carers to the nurses and doctors on the frontline.

[9.2] But in this fight we can be in no doubt that each and every one of us is directly enlisted.

[9.3] Each and every one of us is now obliged to join together.

[9.4] To halt the spread of this disease.

[9.5] To protect our NHS and to save many many thousands of lives.

[9.6] And I know that as they have in the past so many times.

[9.7] The people of this country will rise to that challenge.

[9.8] And we will come through it stronger than ever.

[9.9] We will beat the coronavirus and we will beat it together.

[9.10] And therefore I urge you at this moment of national emergency to stay at home, protect our NHS and save lives.

[9.11] Thank you.

Group 2 - Vaccination certification and COVID passes

[G2-UK-Text 3] *NHS Covid Pass: How can I get a 'vaccine passport' and which places will ask you for one?*

From: NHS & ITV News

Published 3 August 2021

Confrontation

[1] The Covid 'passport' could become an ever-present part of daily life in England as restrictions relax and life begins to return to normal.

[1.1] Some venues and events are encouraged to require the NHS Covid Pass for entry – and it could become law at the end of September to require two doses of the vaccine.

Opening

[2] So what exactly is the pass and how can you get it? Here's what you need to know.

What is an NHS Covid Pass?

Argumentation

[3] [Claim] The NHS Covid Pass – or so-called 'vaccine passport' – is a record of your vaccination or test status.

[3.1] [Grounds] This is something you can show for entry to certain events or places that may require either full vaccination, immunity from a recent positive test, or a very recent negative test.

[3.2] [Grounds] It may be necessary for travelling abroad to some countries and, since July 19, can now be requested in England to prove you are less likely to spread the virus.

[4] [Qualifier] Anyone can get a pass, as long as one of these conditions applies:

[4.1] [Grounds] It has been at least two weeks since completing a full course of vaccination;

[4.2] [Grounds] You have evidence of a negative PCR or rapid lateral flow test taken within 48 hours of entry to a venue;

[4.3] [Grounds] You have proof of natural immunity shown by a positive PCR test result, lasting for 180 days from the date of the positive test and following self-isolation.

[4.4] [Rebuttal] Because children are not currently being vaccinated against Covid, those under 18 should not have to show their Covid status anywhere they go.

[5] [Backing] The easiest way for anyone with a smart phone is to simply download the pass on the NHS App – note, this is different to the NHS Covid-19 app.

[5.1] [Backing] Once you are logged in, an option to 'get your NHS Covid Pass' will already be laid out on the home page. Click there to access your pass.

[5.2] [Backing] In the app, your Covid status will include a barcode with an expiry date. This is simply the date your barcode will automatically refresh and it will update whenever you log in.

[5.3] [Backing] This is important to note if you are planning on either printing off these barcodes or storing them as a PDF – as they may be out of date by the time you use them.

[5.4] [Backing] You will, however, always be able to access up-to-date barcodes on the app itself. It is possible to get your pass from the NHS website too.

[5.5] [Backing] You can also ask for your pass to be sent to you in the post, either by requesting one online or by calling 119.

[5.6] [Backing] This paper version will only state your vaccination status and has no expiry date.

[6] [Warrant] Some events and venues may choose to ask for the pass.

[6.1] [Grounds] Anywhere that fits one of the following descriptions may well opt to require one for entry:

[6.2] [Grounds] A crowded indoor setting, like nightclubs and music venues;

[6.3] [Grounds] A large and unstructured outdoor event, like business events and festivals;

[6.4] [Grounds] Very large structured events like music and sports stadia.

[6.5] [Grounds] You may also need one if you are planning to travel abroad.

[6.6] [Qualifier] What the exact status of your pass – whether it shows full vaccination or proof of immunity – needs to be depends on your destination.

[7] [Rebuttal] Is it a legal requirement? And could you be turned away for not having one?

[7.1] [Qualifier] Use of the pass is purely voluntary for businesses and organisations, although the government says it encourages its use "in facilities or events where people are likely to be in close proximity to a large number of people from other households for a sustained period of time."

[7.2] [Grounds] The government does, however, hope to bring forward a law at the end of September to make two jabs necessary to get into certain venues and events, including night clubs.

[7.3] [Rebuttal/Backing] While venues are currently free to set their own conditions for entry, what they cannot do is discriminate, lawyer Stephanie Hayden told ITV News.

[7.4] [Backing] She said: "The most obvious one that comes to mind in this situation would potentially be disability.

[7.5] [Backing] "So, if for reasons of health, you could not take the vaccine, then it would be wrong under the current legislation and indeed unlawful for a service provider to refuse you access."

[8] [Backing] Data shows that those vaccinated against Covid-19 are significantly less likely to fall seriously ill from the virus, even if it is still possible to catch it and show symptoms.

[8.1] [Warrant] The idea behind passports is to make use of the protection vaccines offer – if people mixing within a certain venue are fully vaccinated, the chances of anyone being hospitalised after catching the virus are greatly reduced.

[9] [Rebuttal] One of the fears around using a passport are the effect it could have on people who, for one reason or another, have not yet had the vaccine.

[9.1] [Backing] Professor of Social Psychology John Drury, from the University of Sussex, told ITV News: "You only need to look at the demographics of who is getting vaccinated and who isn't yet to know that some groups are going to be more excluded than others by a passporting system.

[9.2] [Backing] "I mean, these are quite consistent patterns that young people, people from deprived communities and ethnic minorities are less likely than other groups to be vaccinated.

[9.3] [Backing] "So that would mean that those groups will be more excluded systematically from the activities that require passports."

[10] [Qualifier] So are these passports here to stay?

[10.1] [Warrant] The future of Covid passes will need to be decided by Parliament.

[10.2] [Claim] Ultimately, this decision would need to be made in Westminster.

Conclusion

[11] Professor Drury believes these passes could be accepted by the public if they are "limited" in use.

[11.1] "There has been some research on the conditions under which people would accept vaccine passports," he told ITV News.

[11.2] "And that suggests that they're more acceptable if they have limited application, which means that people are more supportive if these things are not going to be permanent.

[11.3] "If you look at the purpose, it is that they are all tied around specific purposes. That's what makes them acceptable.

[11.4] "So I think it's a political judgment about whether you might want to keep these things, but from the evidence I've seen, I don't think there's a lot of public support for permanent use of vaccine passports and similar."

Group 3 - Explanations of disease surveillance applications

[G3-UK-Text 4] *Coronavirus test, track and trace plan launched on Isle of Wight*

From: Department of Health and Social Care

Published 4 May 2020

Confrontation

[1] Isle of Wight residents will be the first to get access to a new contact tracing app as part of government action to minimise the spread of COVID-19.

[1.2] Isle of Wight announced as first phase of new 'test, track and trace' programme

[1.3] Rollout of NHS COVID-19 App to begin with the island's NHS and council staff tomorrow, with all island residents to get access from Thursday

[1.4] Data privacy and security paramount, with National Cyber Security Centre involved in app development

[1.5] The app will be complemented by enhanced contact tracing using existing methods online and over the phone.

Opening

[2] Isle of Wight residents will be the first to be offered access to a new contact tracing app, as part of government action to test, track and trace to minimise the spread of COVID-19 and move towards safely reducing lockdown measures.

[2.1] Everyone on the island will receive access to the official NHS COVID-19 contact tracing app from this Thursday, with NHS and council staff able to download from 4pm tomorrow, Tuesday 5 May.

Argumentation

[3] [Claim] Part of a new test, track and trace programme, the app will work together with enhanced contact tracing services and swab testing for those with potential COVID-19 symptoms to help minimise the spread of COVID-19.

[4] [Warrant] Developed by NHSX, the technology arm of the health service, and a team of world-leading scientists and doctors, the app is designed to significantly speed up contact tracing, helping reduce the chance of the virus spreading by enabling us to rapidly identify people most at risk of infection so they can take action to protect themselves, the people they care about and the NHS.

[5] [Grounds] When someone reports symptoms through the app, it will detect any other app users that the person has been in significant contact with over the past few days, including unknown contacts such as someone they may have sat next to on public transport.

[5.1] [Grounds] The app will be able to anonymously alert these contacts and provide advice, including how to get a test to confirm whether or not they do have COVID-19.

[5.2] [Grounds] Users will be able order tests through the app shortly.

[6] [Qualifier] For those who may not have access to the app, or the ability to use a smartphone, there will be an option to report symptoms and order tests in other ways.

[6.1] [Backing] As the integrated service develops, everyone who reports symptoms, including app users, will also be asked to record recent contacts using an online service (or through a telephone interview if they prefer), so that contact tracers can reach all contacts who may be at risk, whether or not those contacts are app users.

[6.2] [Backing] Contacts will then be alerted either by the app or by email or telephone, advising them to self-isolate or offering public health advice.

[7] [Backing] As the test, track and trace programme rolls out nationally, expected in mid-May, Public Health England will oversee the deployment of 18,000 additional contact tracers to support the programme.

[7.1] [Claim] This first phase is a major step forward in the government's next phase of the coronavirus strategy and will improve understanding of how this new integrated approach to test, track and trace will work for the rest of the population.

[7.2] [Backing] NHS and council staff will be emailed a download link on Tuesday afternoon.

[7.3] [Backing] From Thursday the app will then open for all residents on the Isle of Wight.

[7.4] [Backing] All households will receive a leaflet with clear instructions on how to download and use the app on Thursday, and a targeted marketing campaign will begin on Friday.

[8] [Backing] Health and Social Care Secretary Matt Hancock said:

[8.1] [Backing] The Isle of Wight is playing a vital role with this pioneering work to help keep Britain safe. This will pave the way for a nationwide roll-out when the time is right.

[8.2] [Claim] Coronavirus is one of the greatest challenges our country has ever faced and this app will play a vital role in getting Britain back on her feet.

[9] [Claim] The app will help control the spread of coronavirus by alerting people they may have come into contact with it and recommending appropriate action.

[9.1] [Backing] This ground-breaking technology, combined with our heroic frontline health and social care staff, and both a nationwide contact tracing testing programme will ensure that we remain in the best position to move toward easing the lockdown.

[10] [Backing] Matthew Gould, Chief Executive of NHSX, said:

[10.1] [Backing] Technology can help us get the country back on its feet.

[10.2] [Grounds] By launching the NHS COVID-19 app we can reduce transmission of the virus by alerting people who may have been exposed, so they can take action to protect themselves, the people they care about and the NHS.

[10.3] [Warrant] When combined with testing and enhanced web and phone contact tracing, this will help the country return to normality and beat coronavirus.

[11] [Grounds] Deputy Chief Medical Officer, Professor Jonathan Van Tam, said: By widespread testing those suspected to be infected with coronavirus, tracing their contacts and where appropriate advising them to self-isolate, we can slow the onward spread of the virus.

[11.2] [Backing] This new app-based system, developed by technology experts in partnership with clinicians and scientists, will run alongside traditional contact tracing by PHE.

[11.3] [Qualifier] If uptake and use is widespread it will give us the greatest room for manoeuvre to ease other social distancing measures.

[12] [Backing] Dr Yvonne Doyle, Medical Director and Director of Health Protection at Public Health England, said: Alongside the NHS COVID-19 app, PHE's phone and web-based contact tracing will be a critical part of the government's strategy to get the country back on its feet.

[12.2] [Backing] Taking these first steps on the Isle of Wight will help us prepare for a scale up of our contact tracing capacity, with an 18,000 strong team ensuring the contacts of confirmed COVID-19 cases are followed up and given the information they need.

[13] [Backing] The government has collaborated internationally and learned from examples of best practice across the world, which has informed the development of a bespoke approach that is right for the unique needs of the UK.

[13.1] [Backing] The app uses similar Bluetooth low energy technology to that employed by Australia, Norway, and Singapore among others.

[14] [Rebuttal/Backing] The privacy and security of users' data is a priority and NHSX has involved experts from the National Cyber Security Centre to advise on best practice through the app's development.

[14.1] [Backing] Data will only ever be used for NHS care, management, evaluation and research and the NHS will comply fully with the law around its use, including the Data Protection Act.

[15] [Grounds] The Isle of Wight was chosen to trial the project because it has a single NHS trust that covers all NHS services on the island.

[15.1] [Backing] Its geography as an island with a sizeable population makes it an ideal place to introduce the NHS COVID-19 app and wider testing service in its initial roll-out period.

[16] [Backing] Isle of Wight Council leader Dave Stewart said:

[16.1] [Backing] On behalf of the island I am very pleased we can be the first place to use this new digital technology in the country.

[16.2] [Backing] I have always been keen to ensure we keep our special community safe from the virus but at the same time explore ways to enable us to get back up on our feet and move forward from it. This scheme offers the tightly controlled approach we need to help us do just that.

[16.3] [Claim/Backing] Widespread tracing and testing holds the key to this ambition and if we are able to help the country move forward then the island will also have done its part in helping government in tackling this virus and rebuilding our lives through safe social distancing when the time is right.

[16.4] [Backing] I am sure islanders will rise to the challenge and help avoid post lockdown spread of the virus and keep people as safe as possible.

[17] [Qualifier] The ambition of test and trace is to enable the UK to start to come out of some elements of lockdown. This will be a gradual process and our experts are considering how best to do this in a way that keeps citizens safe and protects our NHS.

[18] [Backing] Background information:

[18.1] [Backing] The Department of Health and Social Care (DHSC) and NHSX have created some digital assets to support media coverage of the app launching this week.

[18.2] [Backing] Download an HMG explainer video for social channels.

[18.3] [Backing] Download screenshots of the app without IoW specifics.

[18.4] [Backing] Download shots of app on phone in hand.

[18.5] [Backing] Isle of Wight residents will be provided with a range of comprehensive information about what this means for them, including advice on how to access and use this new app.

[18.6] [Backing] Their safety will be of paramount importance during the programme, and the government and NHS are clear that no-one will be put at risk throughout its duration.

[18.7] [Qualifier] For example the current social distancing measures will remain in place.

[19] [Backing] Maggie Oldham, Chief Executive at Isle of Wight NHS Trust, said:

[19.1] [Backing] Our community's response to coronavirus has been fantastic and I want to say thank you for everything they have done to protect the NHS and to save lives.

[19.2] [Backing] It is good news for the island that we have been chosen as the first site in the UK for this app, we can protect local people and play an important role in the national effort to beat coronavirus.

[20] [Backing] Isle of Wight MP Bob Seely said:

[20.1] [Backing] My priority is to keep islanders safe.

[20.2] [Backing] I want us to be able to find and isolate the virus here and make our island safe again.

[20.3] [Backing] If that can happen first in the country, so much the better.

[21] [Rebuttal] It's important that we are clear what is happening.

[21.1] [Rebuttal] I want to reassure islanders that this is not a lifting of lockdown.

[21.2] [Grounds] This first stage is about finding out where the virus is now. This is to protect the NHS and save life.

[23] [Claim] This is important news for the island.

[23.1] [Backing] We will be leading the country in terms of using the very latest technology to keep us safe and halt the spread of this wretched coronavirus.

[24] [Claim] We have a moral duty to protect life now, but we also need to protect life in future.

[24.1] [Backing] This pilot scheme is an important stage of getting life back to normal in time and I am proud that the island is leading the way.

[25] [Backing] The app has been designed to give people a simple way to make a difference and to help keep themselves and their families safe.

[25.1] [Grounds] Once someone installs the app, it will start logging the distance between their phone and other phones nearby that also have the app installed using Bluetooth low energy.

[26] [Grounds] This anonymous log of how close people are to each other will be stored securely on their phone.

[26.1] [Warrant] If a user becomes unwell with symptoms of COVID-19, they can choose to allow the app to inform the NHS which, subject to sophisticated risk analysis, will trigger an anonymous alert to those other app users with whom they came into significant contact over the previous few days.

Conclusion

[27] The app will advise the public what action to take if a user has been close to someone who has become symptomatic. [27.1] The advice on what people should do can be adapted as the context and approach evolves.

[28] Modelling by academics at Oxford University's Big Data Institute shows that the app has the potential to save thousands of lives, and that for every 1 to 2 people who download the app, an infection could be prevented.

[G3-UK-Text 5] *NHS COVID-19 app launches in England and Wales*

From: Gov.uk

Published 25 September 2020

[Intro] NHS COVID-19 app launches in England and Wales to help control COVID-19 transmission alongside national and local contact tracing.

Features of the app include contact tracing using Bluetooth, risk alerts based on postcode data security at its heart.

Businesses are now required by law to display the official NHS QR code posters from today so people can check-in at different premises with the app.

Confrontation

[1] People across England and Wales are being urged to download the NHS COVID-19 app to help control the spread of coronavirus and protect themselves and their loved ones as case numbers rise.

[1.1] The app launches today, and after positive trials and rigorous testing is an important new tool to work alongside traditional contact tracing to help reduce the spread of the virus.

Opening

[2] It will be available to those aged 16 and over in multiple languages. It forms a central part of the NHS Test and Trace service in England and the NHS Wales Test, Trace, Protect programme - identifying contacts of those who have tested positive for coronavirus.

[2.1] As part of a major campaign to encourage downloads of the app a new advertisement will launch on primetime TV tonight with the strapline "Protect your loved ones. Get the app".

Argumentation

[3] [Claim] Today the UK's major mobile network operators, including Vodafone, Three, EE and O2, Sky and Virgin, have confirmed that all in-app activity will not come out of customers' data allowance.

[3.1] [Grounds] The contact tracing element of the app works by using low-energy Bluetooth to log the amount of time you spend near other app users, and the distance between you, so it can alert you if someone you have been close to later tests positive for COVID-19 – even if you don't know each other.

[3.2] [Qualifier] The app will advise you to self-isolate if you have been in close contact with a confirmed case. It will also enable you to check symptoms, book a free test if needed and get your test results.

[3.3] [Claim] The app has been designed with user privacy in mind, so it tracks the virus not people, and uses the latest in data security technology to protect privacy. [3.4] [Backing] The system generates a random ID for an individual's device, which can be exchanged between devices via Bluetooth (not GPS). [3.5] [Backing] These unique random IDs regenerate frequently to add an extra layer of security and preserve anonymity.

[3.6] [Warrant] The app does not hold personal information such as your name, address or date of birth, and only requires the first half of your postcode to ensure local outbreaks can be managed. [3.7][Warrant] No personal data is shared with the government or the NHS.

[3.7] [Backing] UK Government Health and Social Care Secretary Matt Hancock said:

"We are at a tipping point in our efforts to control the spread of this virus. With infection rates rising we must use every tool at our disposal to prevent transmission, including the latest technology.

[3.9] [Backing] "We have worked extensively with tech companies, international partners, and privacy and medical experts – and learned from the trials – to develop an app that is secure, simple to use and will help keep our country safe.

[3.10] [Backing] "Today's launch marks an important step forward in our fight against this invisible killer and I urge everyone who can to download and use the app to protect themselves and their loved ones."

Conclusion

[4] From today (Thursday 24 September) certain businesses in England are required by law to display NHS Test and Trace QR codes so customers with the NHS COVID-19 app can use them to check-in. QR codes will help businesses meet their legal requirement to log contact details and allow public health leads to send alerts based on whether people have checked in at venues. So far, more than 160,000 businesses have already downloaded QR codes. Venues in Wales that are legally required to collect and keep a record of visitors will still need to do so.

[4.1] The NHS Test and Trace team behind the app has worked closely with major tech companies, including Google and Apple, scientists within the Alan Turing Institute and Oxford University, Zuhlke Engineering, medical experts, privacy groups, at-risk communities and teams in countries across the world using similar apps – such as Germany, to develop an app that is safe, simple and secure.

[4.2] The app has been through successful trials in the Isle of Wight, Newham and among NHS Volunteer Responders and lessons learned have informed the final version that is launching today.

[G3-UK-Text 6] *Introducing the NHS COVID-19 app*

Confrontation

[1] The NHS COVID-19 app remains a useful tool as we learn to live safely with COVID-19.

Opening

[2] It is based on Apple and Google's privacy-preserving technology. And can help us safely live with COVID-19, and protecting you and others.

Argumentation

[3] [Claim] If you come into close contact with another app user who subsequently reports a positive test result, the app will send you an anonymous alert.

[3.1] [Backing] You will receive the latest guidance with some steps you can take to protect those around you. [3.2] [Backing] If you feel unwell, you can check your symptoms in the app. [3.3] [Backing] Any data shared with the app is held on your phone. [3.4] [Warrant] Nobody will know who or where you are. [3.5] [Modality] You can delete the app and all data at anytime. [3.6] [Claim] The NHS COVID-19 app is the only way to find out you've been in close contact with someone you don't know who has later tested positive for COVID-19.

Conclusion

[4] The more informed we are, the more we're able to protect people at higher risk from COVID-19.

[G3-UK-Text 7] *NHS COVID-19 App Updates Across England and Wales*

Confrontation

[1] Updates to the app will make it more accurate and user-friendly.

[1.1] Around 40% of adults with eligible smartphones have now downloaded the NHS COVID-19 app.

[1.2] Updates increase app's accuracy in identifying close contacts.

[1.3] Removes unnecessary exposure notifications to improve communications to app users.

[1.4] NHS COVID-19 app users will benefit from updates to the app that make it more accurate and user-friendly from today, 29 October. This is the latest in a series of updates since national launch, designed to improve the efficacy and usability of the app.

Opening

[2] The app, which has now been downloaded 19 million times by around 40% of eligible smartphone owners, will be updated to better estimate distance between users to increase the accuracy of close-contact notifications sent out by the app.

[2.1] The accuracy will be even better than at launch, and working in collaboration with scientists from The Alan Turing Institute to utilise the latest version of the Google/Apple API, it is now the only app globally to have innovated its underlying technology to exploit this latest API update. [2.2] This improves the estimation of distance via Bluetooth, further helping to break chains of transmission.

Argumentation

[3] [Grounds] By improving the accuracy of how the app estimates distance, it can better assess whether someone is at risk of having caught the virus and therefore needs to isolate. [3.1] [Claim] This means the app will better protect users, their loved ones and our communities.

[3.2] [Backing] The app has been designed with user privacy in mind, so it tracks the virus not people, and uses the latest in data security technology to protect privacy.

[3.3] [Warrant] The system generates a random ID for an individual's device, which can be exchanged between devices via Bluetooth (not GPS).

[3.4] [Backing] These unique random IDs regenerate frequently to add an extra layer of security and preserve anonymity.

[3.5] [Backing] The app does not hold personal information such as your name, address or date of birth, and only requires the first half of your postcode to ensure local outbreaks can be managed.

[3.6] [Backing] No personal data is shared with the government, police or the NHS.

[4] [Claim] The update also addresses the issue of 'ghost' exposure notifications, sent by Google and Apple when the app interacts with the API, improving the clarity of app communications.

[4.1] [Backing] NHS Test and Trace Director of Product, Gaby Appleton, said:

[4.2] [Backing] The team behind the app are continually working to improve its accuracy and user experience, to make it as simple as possible to keep users and their loved ones safe.

[4.3] [Backing] We are thrilled that over 19 million people have chosen to download the app to help protect their loved ones while preserving their privacy, and that over 680,000 QR codes have been created by businesses to support digital contact tracing.

[4.4] [Backing] This update builds on that success by increasing accuracy, and also removing 'ghost' exposure notifications, meaning users will only be notified if they need to self-isolate.

[4.5] [Qualifier] The more people who use the app, the better it works, so I encourage all those who have not yet downloaded the app to do so.

[5] Mark Briers of The Alan Turing Institute said:

[Backing] This update increases the accuracy, meaning those most at risk will be notified to self-isolate.

[6] [Grounds] Change to risk threshold

The app uses a combination of distance, proximity and infectiousness of a contact to calculate the risk threshold at which someone is notified to self-isolate. The latest update uses technology to better measure distance, meaning we can reduce the number of low-risk contacts notified to self-isolate without impacting the number of high-risk contacts notified to self isolate.

[6.1] [Claim] This means now, more than ever, those who are notified by the app to self-isolate are at high-risk and should isolate to break the chain of transmission and control the spread of the virus.

[6.2] [Backing] The risk threshold is not static – it can be turned up or down and will be kept under review and changed periodically to reflect the stage of the coronavirus pandemic.

[6.3] [Backing] The update will also lower the threshold set to notify users at risk of having caught the virus to self-isolate. See more detail on this change.

[6.4] [Rebuttal] This is expected to increase the number of people asked to self-isolate by the app having been in close contact with someone who has tested positive.

[6.5] [Qualifier] In the context of rising infection rates across the country, this change is necessary to break the chain of transmission, helping curb the spread of the virus and therefore ensuring fewer people are infected in the long term.

[7] Ending 'ghost' notifications

[7.1] [Claim] By removing these unnecessary 'ghost' exposure notifications, it will be clearer to app users they only need to self isolate when instructed to do so by the app.

[7.2] [Backing] The new update will be available immediately on all eligible Android phones, and iPhones running on operating system iOS 3.7 or above.

[7.3] [Backing] The app is also set to become interoperable with contact tracing apps in Scotland, Northern Ireland, Jersey and Gibraltar.

[7.4] [Backing] We are currently consulting with the National Cyber Security Centre to ensure this process is secure and reliable, functioning effectively to benefit everyone using contact tracing apps across the UK.

[7.5] [Qualifier] We expect this update to be released in early November.

[7.6] [Warrant] When interoperability is implemented, if an app user tests positive for coronavirus, they can choose to upload the anonymous keys their phone has been exchanging with other phones so alerts can be sent to other app users across the UK, Jersey and Gibraltar.

[7.7] [Backing] We are committed to publishing more detailed app data in due course.

[8] [Grounds] Background information

The app is available to all those over 16 in England and Wales, and operates in 12 languages.

[8.1] [Claim] It forms a central part of the NHS Test and Trace service in England and the NHS Wales Test, Trace, Protect programme, identifying contacts of those who have tested positive for coronavirus.

[8.2] [Grounds] As of Sunday 25 October, the NHS COVID-19 app had been downloaded over 19 million times across England and Wales.

Conclusion

[9] The NHS Test and Trace team behind the app has worked closely with major tech companies, including Google and Apple, scientists within The Alan Turing Institute and Oxford University, Zuhlke Engineering, medical experts, privacy groups, at-risk communities and teams in countries across the world using similar apps – such as Germany – to develop an app that is safe, simple and secure.

Group 4 - Official commentary on surveillance technologies

[G4-UK Text 8] *NHS COVID-19 App Has Been Downloaded Over 10 Million Times*

From: NHS

Published 27 September 2020

Introduction: Over 10 million people in England and Wales have downloaded the app, 6 million on the first day.

1.5 million venue check-ins on Saturday with the new app receiving positive reviews.

Businesses embrace the new app with 460,000 QR code posters downloaded and printed

Confrontation

[1] People in England and Wales have given an overwhelming response to calls for them to download the new NHS COVID-19 app, with over 10 million people downloading it so far, 6 million of whom did so on its first day (Thursday 24 September).

[1.1] The app forms a central part of the NHS Test and Trace service in England and the NHS Wales Test, Trace, Protect programme – identifying contacts of those who have tested positive for coronavirus.

Opening

[2] On Sunday 27 September at 12pm, there had been over 10 million downloads across compatible Google and Apple devices in England and Wales.

[2.1] In addition, the app has received a warm reception from those downloading it with reviewers on the Apple app store giving it a 4.5 star review (out of 5) and the Google Play Store giving it 4.1 stars (out of 5).

[2.2] Health and Social Care Secretary Matt Hancock said:

The enthusiastic response of over 10m people downloading the app in just three days has been absolutely fantastic.

This is a strong start but we want even more people and businesses getting behind the app because the more of us who download it the more effective it will be.

If you haven't downloaded it yet I recommend you join the growing numbers who have, to protect yourself and your loved ones.

Argumentation

[3] [Grounds] The app has already been put to use over the weekend with more than 1.5 million venue check-ins recorded on Saturday 26 September. More than 460,000 businesses have embraced the new app by downloading and printing QR code posters that can be scanned by the app to check-in to premises.

[3.1] [Claim] The QR codes are an important way for NHS Test and Trace in England and NHS Test, Trace, Protect in Wales to contact multiple people if coronavirus outbreaks are identified in venues.

[3.2] [Warrant] Businesses are expected to make sure their customers are aware of the rules around QR codes by displaying posters and speaking to customers directly or record and maintain contact details logs for customers, visitors and staff.

[3.3] [Backing] Dido Harding, Executive Chair of England's NHS Test and Trace Programme, said: The level of support for the NHS COVID-19 app is yet another example of how the public and businesses across England and Wales are pulling together to tackle coronavirus.

[3.4] [Backing] The integration of contact tracing and venue check-in is a key feature of the NHS COVID-19 app, giving us an easy and straightforward way for us all to help protect one another. I urge any businesses yet to print and display the posts to join this effort and download them now.

[3.5] [Backing] A major campaign encouraging downloads of the app launched over the weekend with new advertisements launching on primetime TV, radio, and billboards across the length and breadth of England and Wales, featuring the strapline 'Protect your loved ones. Get the app.'

[3.6] [Backing] Simon Thompson, Managing Director of the NHS COVID-19 App, said: With 1.5 million venue check-ins recorded on Saturday, the public have already put the NHS COVID-19 app to great use.

[3.7] [Qualifier] Everyone who downloads the app will be helping to protect themselves and their loved ones and I really encourage everyone who can to get it.

[4] [Claim] The app launched on Thursday 24 September after positive trials and rigorous testing and is an important new tool to work alongside traditional contact tracing to help reduce the spread of the virus. It is available to those aged 16 and over in multiple languages.

[4.1] [Backing] The contact tracing element of the app works by using low-energy Bluetooth to log the amount of time you spend near other app users, and the distance between you, so it can alert you if someone you have been close to later tests positive for COVID-19 – even if you don't know each other.

[4.2] [Backing] The app will advise you to self-isolate if you have been in close contact with a confirmed case. It will also enable you to check symptoms, book a free test if needed, and get your test results.

[4.3] [Backing] Everyone who receives a positive test result can now log their result on the app. If you get a test in an NHS hospital, through a PHE lab – which carry out tests for NHS hospitals - or in a surveillance study, you can request a code from NHS Test and Trace to log a positive result.

[4.4] [Rebuttal] The app has been designed with user privacy in mind, so it tracks the virus, not people and uses the latest in data security technology to protect privacy.

[4.5] [Rebuttal] The system generates a random ID for an individual's device, which can be exchanged between devices via Bluetooth (not GPS).

[4.6] [Rebuttal] These unique random IDs regenerate frequently to add an extra layer of security and preserve anonymity.

[4.7] [Rebuttal] The app does not hold personal information such as your name, address, or date of birth, and only requires the first half of your postcode to ensure local outbreaks can be managed. No personal data is shared with the government or the NHS.

[4.8] [Grounds] Potential users are based on the population of over 16s in England and Wales who have a compatible phone.

[4.9] [Backing] As well as contact tracing, the app has a range of additional, enhanced features that will help to reduce personal and public risk from COVID-19 as part of the wider testing and contact tracing service:

[Backing] Alert: letting users know the level of coronavirus risk in their postcode district

[Backing] QR check-in: enabling users to check-in at a venue and alerting them if they have recently visited somewhere they may have come into contact with someone who later tests positive for COVID-19

[Backing] Symptoms: allowing users to check if they have coronavirus symptoms and see if they need to order a free test

[Backing] Test: helping users book a free test through the app and get results to know whether they have COVID-19

[Backing] Isolate: if a user is told to self-isolate, a timer feature will help count down that period and access will be provided to relevant advice

[Backing] Designated venues now have a legal requirement to maintain records of customer contact details and display an official NHS QR code poster ahead of the rollout of the NHS COVID-19 app.

[Backing] The regulations will be enforced by Local Authorities, who will have the power to issue fines of up to £1,000 for venues that are failing to comply, or the police as a last resort. Fines will rise to up to £4,000 for repeat offenders.

[4.10] [Warrant] Businesses are expected to make sure their customers are aware of the rules around QR codes by displaying posters and speaking to customers directly.

Group 5 - Privacy standards and legal considerations

[G5-UK Text 9] *Biometrics Commissioner statement on the use of symptom tracking applications*

From: Gov.uk

Published 21 April 2020

Confrontation

[1] I have been approached by a number of journalists asking for my comments on the possible use of symptom tracking applications, digital contact tracing applications and digital immunity certificates. [1.1] Strictly speaking this is not part of my responsibility since my role is limited to the police use of biometrics both for criminal investigation and national security. [1.2] However, the possible use of phone applications to track coronavirus (COVID-19) is a form of surveillance more normally associated with policing and could have a policing purpose, albeit one connected to controlling a pandemic. [1.3] In that sense the way in which the police use of biometrics has been regulated may hold some lessons.

Opening

[2] The first question about any public use of biometrics for surveillance is: is there a public interest in doing so? [2.1] That is, not a private interest but one that benefits the society and its citizens to such an extent as to outweigh any intrusion into an individual's general right to privacy. [2.2] Such questions are of such significance that they should be decided by Parliament and enshrined in law, as was the case for the police use of DNA and fingerprints in the Protection of Freedoms Act 2012 (PoFA).

Argumentation

[3] [Claim] Given the general and public threat from coronavirus such a public interest test may well be accepted in this case. [3.1] [Rebuttal] However, unless we believe that the coronavirus threat is permanent (and at present we do not know), [3.2] [Qualifier] then it may be that the public interest test is only passed for so long as the threat remains [3.3] [Warrant] That means that public surveillance to try and control coronavirus probably should be regarded as time limited and should be included in emergency legislation. [3.4] [Backing] Parliament certainly acted in this manner when it passed the Coronavirus Act 2020 which, in part, suspended some aspects of PoFA in response to the health emergency. [3.5] [Modality] It did so by insisting that the emergency provision had to be limited initially to 6 months and the relevant regulations made in consultation with the Biometrics Commissioner.

[4] [Claim] If surveillance of coronavirus is regarded as valid only during the pandemic then it is important that public trust in such a process is encouraged by regulation approved by Parliament as to the limitations of that surveillance. [4.1] [Backing] A group of university lawyers have produced a suggested Coronavirus (Safeguards) Bill that they believe would be necessary in order to protect an individual's right not to participate, their anonymity, to limit

the period for which it could be done and to regulate what use could be made of any data which was collected and who it could be shared with.

Conclusion

[5] The Ada Lovelace Institute, an independent research body, have also carried out some initial analysis of the evidence and made some recommendations about accountability and the need for legislation. [5.1] Such protections would go some way to limit use to the emergency period and to balance the immediate public interest against citizen's longer-term interest in privacy and to ensure that such surveillance is not extended beyond the coronavirus emergency or into other areas of public life without further consideration by Parliament and further legislation. [5.2] The coronavirus emergency has highlighted the very rapid development of new biometric technology in general and its possible use by the State but also by private interests and why that is something that needs a new framework of governance backed by legislation.

[5.3] For more on this latter point see my forthcoming Annual Report 2019.

[G5-UK Text 10] NHS COVID-19 app Privacy FAQs: Your Privacy Protected

From: NHS

(No publication date given)

[Subtitle] Privacy and data security

[1] [Grounds] [Subtitle] What data does the app store collect?

[1.1] [Grounds] The app collects the following information and holds it on your phone:

• The postcode district you enter when you install the app

• The symptom information you enter onto the app

• The QR poster codes of the venues that you scan into the app

[1.2] [Qualifier] You are able to view all the data held about you and you can delete it at any time.

[2] [Claim] [Subtitle] How can I be sure my data is safe?

[2.1] [Warrant] The app has been designed using Google and Apple technology to use as little personal data and information as possible.

[2.2] [Backing] All the data that could directly identify you is held on your phone and not shared anywhere else.

[2.3] [Backing] Any data that is provided from the phone will always be made anonymous.

[2.4] [Backing] The app uses random unique IDs for contact tracing.

[2.5] [Backing] These codes are shared between other app users' phones and they change every 15 minutes.

[2.6] [Backing] When shared, these codes will remain on phones for 14 days to cover the incubation period of coronavirus.

[2.7] [Backing] There is no way for another app user to identify you from this code.

[3] [Claim] [Subtitle] What data is shared outside the app?

[3.1] [Grounds] By using the app, analytics data is collected which helps us to learn more about the virus and how we can develop our public health response.

[3.2] [Grounds] For example, we can tell the number of people who have booked tests, through data collected, when you select the option to 'book a test'.

[3.3] [Grounds] By entering symptoms and sharing this information with the app, we can learn more about the locations where symptoms are developing.

[3.4] [Backing] All analytics data is anonymous and cannot be linked back to you.

[3.5] [Warrant] By using the app, you will be making an important contribution in supporting the NHS and helping us to win the fight against coronavirus.

[4] [Claim] [Subtitle] Why does the NHS COVID-19 app ask for my postcode district?

[4.1] [Grounds] The app only uses your postcode district.

[4.2] [Grounds] This is the first part of your postcode up until the space.

[4.3] [Grounds] For example, "PE12". It will not provide the precise location where you live.

[4.4] [Warrant] We need your postcode district to help the NHS:

• Learn more about the impact on communities

• Monitor effectiveness

• Predict hospital demand

• Provide tailored advice.

[5] [Claim] [Subtitle] What data is stored with venue check-in?

[5.1] [Grounds] If you choose to use the venue check-in feature, your phone will only store data about when and where you checked in and what time.

[5.2] [Warrant] This will help to remind you about where you have been, if you are contacted by an NHS contact tracer.

[5.3] [Qualifier] The data is stored for 21 days and you can review or delete this data at any time.

[5.4] [Qualifier] This means you can delete all venues or any specific venue of your choice.

[6] [Claim] [Subtitle] Can I be identified if I share my data?

[6.1] [Warrant] The NHS COVID-19 app does not hold any information which could directly identify you.

[6.2] [Backing] If you test positive and decide to share, random IDs are used and no personal data is shared.

[6.3] [Rebuttal] Whilst you cannot be identified by data you share, in some unlikely circumstances, others may be able to infer you were the person who tested positive.

[6.4] [Grounds] For example, if an app user had only been in contact with you.

[6.5] [Rebuttal/Backing] However, this could also happen with traditional contact tracing.

[6.6] [Backing] The app itself cannot share or send any personal information about you when sending alerts.

[7] [Claim] [Subtitle] Why does the NHS COVID-19 app need permission to access my camera?

[7.1] [Grounds] The app uses your camera to read the NHS QR code on posters at venues.

[7.2] [Grounds] Once you have checked in, the time, date and venue is stored on your phone.

[7.3] [Backing] The camera access is then immediately disabled.

[7.4] [Backing] The app cannot access any photos on your phone.

[8] [Claim] [Subtitle] Can I delete the app?

[8.1] [Grounds] You can delete the app at any time.

[8.2] [Grounds] This will also delete all data stored on the app.

[8.3] [Backing] If you choose to delete, you will no longer receive exposure alerts.

[8.4] [Backing] The app works in addition to the regular contact tracing.

[8.5] [Rebuttal/Qualifier] If you no longer want to use the app, tracers will still contact you if exposed.

[8.6] [Warrant] However, the app is the fastest way to see if you are at risk and protect your loved ones.

[8.7] [Backing] The app also does the 'remembering' for you by storing anonymous proximity data.

[9] [Claim] [Subtitle] How long will my contact tracing data be stored?

[9.1] [Grounds] The app will keep a log of anonymous contact tracing data for a maximum of 14 days.

[9.2] [Grounds] Venue check-in information is stored for 21 days.

[9.3] [Backing] This takes into account incubation plus an additional 7 days.

[9.4] [Backing] This allows time for Health Protection teams to investigate outbreaks.

[9.5] [Backing] The app automatically deletes data after these periods expire.

Appendix 2 – CN Corpus

Group 1 – Statements from national leaders

[G1-CN-Text 1] *Xi Jinping: Address at the Meeting on Coordinating the Prevention and Control of COVID-19 and Economic and Social Development*

From: Gov.cn, sourced from Xinhua News Agency

Published 23 February 2020

Confrontation

[1] Comrades,

Today, we are convening a meeting to coordinate the ongoing efforts in COVID-19 epidemic prevention and control, as well as in economic and social development. [1.1] The main purpose is to analyse the current situation of epidemic prevention and control, and to plan the next steps for both controlling the epidemic and promoting economic and social progress. I would like to make a few points:

[2] [Subtitle] (1) On the previous stage of epidemic prevention and control work.

[2.1] Since the outbreak of COVID-19, the Party Central Committee has attached great importance to the issue, swiftly made decisions, and comprehensively strengthened its centralised and unified leadership over epidemic prevention and control.

[2.2] On 7 January, while chairing a meeting of the Standing Committee of the Political Bureau of the CPC Central Committee, I set out requirements for handling the epidemic. [2.3] On 20 January, I issued specific instructions on epidemic prevention and control, requiring all levels of Party committees and governments, as well as relevant departments, to prioritise the safety and health of the people above all else, and to take practical and effective measures to resolutely curb the spread of the virus.

[2.3] On the first day of the Lunar New Year, I chaired another meeting of the Politburo Standing Committee to re-examine, re-deploy, and re-mobilise the epidemic prevention and control work. [2.4] It was decided to establish the Central Leading Group on Epidemic Response, to dispatch central guidance groups, and to require the State Council's Joint Prevention and Control Mechanism to fully perform its coordinating functions.

[2.5] Following this, I chaired three additional meetings of the Politburo Standing Committee and one meeting of the Political Bureau, all focused on epidemic control and the resumption of work and production. [2.6] On 10 February, I visited Beijing to inspect and guide epidemic prevention work, and conducted video calls with the frontlines in Hubei and Wuhan to hear reports from the Central Guidance Group and the Hubei Command Centre.

[2.7] In addition, I chaired meetings of the Central Committee for Comprehensively Governing the Country According to Law, the Central Cyberspace Affairs Commission, the Central Commission for Deepening Reform, and the Central Foreign Affairs Commission, putting forward requirements for epidemic prevention from various perspectives.

[2.8] The Party Central Committee issued the *Notice on Strengthening the Party's Leadership to Provide Strong Political Guarantee for Winning the Battle Against the Epidemic*. [2.9] I have been paying close attention to epidemic control work, issuing oral instructions and written comments on a daily basis.

Opening

[3] The Central Leading Group has studied and deployed relevant tasks in a timely manner; the Central Guidance Group has carried out its work actively; the Joint Prevention and Control Mechanism under the State Council has strengthened overall coordination; Party committees and governments at all levels have acted positively—racing against time and fighting the virus—forming a strong collective force to combat the epidemic.

[3.1] "When the sea is stormy, true heroes emerge."

[3.2] In this fierce battle, Party organisations at all levels and the broad ranks of Party members and officials charged ahead and fought tenaciously, fully demonstrating their roles as strongholds of resistance and exemplary pioneers. [3.3] Medical workers, undaunted and selfless, fought day and night, embodying the noble spirit of healing the sick and saving lives with compassion and dedication. [3.4] The officers and soldiers of the People's Liberation Army responded swiftly to orders and took on the toughest tasks, showing their political character of loyalty to the Party and the people.

[4] The masses united with one heart, supporting each other in solidarity. [4.1] In particular, the people of Wuhan and Hubei showed great understanding of the broader picture and consciously cooperated with epidemic control efforts, demonstrating an indomitable will. [4.2] Public security officers, disease control workers, community staff, and others stood firm at their posts day and night; journalists braved hardships and went deep into the frontline; and numerous volunteers made selfless contributions with tireless dedication — all of whom made significant contributions to epidemic prevention and control.

[4.3] Departments in health, development and reform, industry and information, commerce, foreign affairs, transport, agriculture and rural affairs, emergency management, finance, culture and tourism, science and education, market regulation, social security and healthcare, natural resources and the environment, state-owned assets, forestry and grasslands, as well as disciplinary inspection, organisation, publicity, the united front, and political-legal sectors each fulfilled their responsibilities. [4.4] The National People's Congress, the CPPCC, and

various mass organisations also took the initiative to shoulder their duties, implementing strong measures to support the fight against the epidemic.

[5] All sectors of society, including compatriots from Hong Kong, Macao, Taiwan, and overseas Chinese, generously donated funds and supplies, demonstrating a deep sense of solidarity in weathering the storm together.

[6] In the recent period, we have mainly focused on the following areas of work:

[6.1] Firstly, we promptly formulated strategies and policies for epidemic prevention and control.

[6.2] Winning a battle first requires the right strategy. [6.3] The Party Central Committee assessed the situation thoroughly and in a timely manner, putting forward the general requirements of strengthening confidence, working in unity, scientific prevention, and targeted measures, with the clear overall goal of resolutely curbing the spread of the epidemic and winning the battle against COVID-19.

[6.4] In accordance with the law, we classified COVID-19 as a Category B infectious disease but adopted Category A control measures. [6.5] We adhered to a nationwide unified approach, mobilising resources from all sectors as a crucial guarantee for prevention and control, while focusing on controlling sources of infection and cutting off transmission routes. [6.6] The epidemic response was coordinated with unified leadership, command, and action, and launched as a people's war, a general war, and a blockade war.

[6.7] We emphasised the principles of early detection, early reporting, early isolation, and early treatment, and advocated for the centralised treatment of patients, experts, resources, and efforts, making the improvement of admission and recovery rates and the reduction of infection and mortality rates a key focus.

[6.8] Grounded in local conditions and the epidemic's dynamics, we implemented differentiated and responsive policies. [6.9] Wuhan and Hubei were treated as the main battlefront, while other provinces were guided with classified measures. [6.10] By strictly defending four critical lines, advancing step by step and deepening layer by layer, we established a strategic structure characterised by full mobilisation, full deployment, and full strengthening of epidemic prevention and control.

[7] Secondly, strengthening unified command of epidemic prevention and control in Wuhan and Hubei.

[7.1] On 22 January, the CPC Central Committee decisively ordered Hubei Province to implement comprehensive and strict controls on the outflow of people. [7.2] Making this decision required significant political courage, but decisive action was essential—hesitation in the face of a crisis only leads to chaos. [7.3] The Central Committee designated epidemic prevention in Wuhan and Hubei as the top priority, setting clear requirements to prevent both internal spread and external export of the virus. [7.4] It called for more stringent, targeted, and effective measures to contain the outbreak.

[8] The Central Guidance Group faithfully implemented these decisions, strengthening supervision and guidance over Hubei and Wuhan's control efforts. [8.1] Nationwide support was mobilised: 29 provinces, autonomous regions, municipalities, the Xinjiang Production and Construction Corps, and the armed forces dispatched more than 330 medical teams, totalling over 41,600 medical personnel. [8.2] Emergency hospitals such as Huoshenshan and Leishenshan, as well as makeshift "Fangcang" hospitals, were rapidly constructed, and medical supplies were prioritised for Wuhan and Hubei. [8.3] Furthermore, 19 provinces were paired to support different parts of Hubei.

[8.4] In response to serious early shortcomings in the region's epidemic control, the Central Committee promptly called for rectification and made adjustments to the leadership teams of the Hubei Provincial Party Committee and Wuhan Municipal Party Committee.

[9] Thirdly, coordinating epidemic control across other regions.

[9.1] Provinces and municipalities swiftly activated Level-1 responses to major public health emergencies, building mechanisms for joint prevention, control, and mass mobilisation. [9.2] The outbreak coincided with the peak of the Spring Festival travel season. [9.3] To control the spread nationwide, the public was urged to reduce movement and cooperate in fighting the epidemic. [9.4] The Spring Festival holiday was extended to ease travel pressures.

[9.5] Support was intensified for populous and high-mobility provinces such as Beijing, Zhejiang, and Guangdong, as well as regions neighbouring Hubei. [9.6] These areas were instructed to adopt targeted measures to prevent external importation and internal spread of the virus. [9.7] To mitigate the risk of renewed outbreaks from post-holiday travel, measures

such as delayed school reopening, staggered return to work, and off-peak travel were introduced, along with strict health monitoring and personnel management.

[10] Fourthly, securing emergency supplies of medical and daily necessities.

[10] The fight against COVID-19 was also a logistics battle. [10.1] Measures were swiftly taken to resume and expand production of urgently needed medical supplies like protective clothing and masks. [10.2] National-level coordination of essential resources was implemented, "green channels" for transport were established, and multiple strategies were employed to ensure supply for key regions.

[10.3] Efforts were made to secure the production, distribution, and supply of agricultural and food products, energy sources such as coal, electricity, oil, and gas—ensuring overall stability in the market. [10.4] We also advanced medical research and clinical applications, achieving important interim results.

[11] Fifthly, safeguarding social stability.

[11.1] Historically, major epidemics and disasters often lead to social disorder, which in turn worsens the crisis. [11.2] We promoted efforts to maintain social stability, properly handling problems arising from control measures, safeguarding order in medical and consumer markets, and cracking down on epidemic-related crimes. [11.3] Psychological counselling and public reassurance were strengthened.

[11.4] Although strict traffic controls were necessary in the early phase to cut off virus transmission, some excessive enforcement occurred, which we promptly ordered localities to correct. [11.5] National transport routes have since returned to near-normal operation.

[12] Sixthly, strengthening public communication and media guidance.

[12.1] We stepped up public communication, coordinating online and offline, domestic and international messaging to build confidence, offer comfort, and foster unity. [12.2] Information release mechanisms were improved to ensure transparency and clear communication of the Central Committee's decisions, local measures, and frontline stories.

[12.3] Public education campaigns explained prevention knowledge and encouraged rational attitudes, boosting individual awareness and self-protection. [12.4] We responded swiftly to public concerns, addressed key issues without avoidance, and promoted problem-solving.

[12.5] International communication was also improved, telling China's anti-epidemic story to the world and rebutting malicious rumours and slander with timely, fact-based responses.

[13] Seventhly, proactively seeking international support.

[13.1] The international community paid close attention to how China responded and the effectiveness of its efforts. [13.2] China's strength, spirit, and efficiency in epidemic control, as well as its image as a responsible major power, earned high praise globally. [13.3] Leaders from over 170 countries and 40 international organisations sent messages of sympathy and support.

[14] China not only implemented comprehensive domestic measures but also actively engaged with the WHO and other international actors, sharing viral genome sequences and diagnostic technologies, and working to prevent global spread. [14.1] The international community widely recognised China's decisive containment efforts and its exceptional leadership, coordination, and execution—achievements that many other countries could not match, setting a benchmark for global public health response.

[15] This outbreak of COVID-19 has been the most rapidly spreading, widely affecting, and most challenging public health emergency to control since the founding of the People's Republic of China. [15.1] For us, it has been both a crisis and a major test. [15.2] Through arduous efforts, we are now seeing a positive and improving trend in epidemic prevention and control. [15.3] Practice has proven that the Party Central Committee's assessment of the situation was accurate, its decisions timely, and the measures taken strong and effective. [15.4] The success achieved in controlling the epidemic once again highlights the notable strengths of the leadership of the Chinese Communist Party and the socialist system with Chinese characteristics.

[16] At this point, on behalf of the Party Central Committee, I would like to extend sincere greetings to Party members, officials, and the general public across the country—especially to the people of Hubei and Wuhan. [16.1] I express my highest respect to the medical workers, members of the People's Liberation Army, and comrades across all sectors who have been fighting on the front line. [16.2] I offer heartfelt thanks to our compatriots in Hong Kong, Macao, and Taiwan, as well as overseas Chinese. [16.3] I express deep appreciation to the countries, international organisations, and friends who have supported China in our epidemic control efforts.

[17] To the compatriots and medical workers who have tragically lost their lives in the fight against the virus, I offer our profound condolences. [17.1] And to those who are still battling the illness, along with their families, the families of fallen public servants, and the bereaved families of the deceased, I extend our sincere sympathies.

Argumentation

[18] [Subtitle] (2) Key Priorities for Strengthening Current Epidemic Control

[18.1] [Claim] While recognising the achievements made, we must remain sober-minded about the fact that the current epidemic situation remains severe and complex. [18.2] [Grounds] We are now in the most strenuous and critical stage of prevention and control. [18.3] [Warrant] At this moment, we must be highly alert to complacency, fatigue, wishful thinking, and slackness. These mentalities could lead to serious consequences and risk undoing all our previous efforts. [18.4] [Backing] Party committees and governments at all levels must stay confident of victory, stand firm, and continue to implement all prevention and control measures with undiminished intensity and meticulous attention. [18.5] [Qualifier] We must never claim success until we have truly won.

[18.6] [Grounds] At present, the following key tasks need to be prioritised:

[19] [Subtitle] 1. Resolutely win the battle to defend Hubei and Wuhan.

[19.1] [Claim] Victory in Wuhan means victory in Hubei; victory in Hubei means victory for the nation. [19.2] [Grounds] We must focus on two critical areas: epidemic control in urban and rural communities, and treatment of patients. [19.3] [Grounds] We must work to raise recovery and treatment rates while lowering infection and mortality rates. [19.4] [Grounds] It is essential to curb further spread and transmission. [19.5] [Backing] We must significantly strengthen the grassroots response, especially in communities, expand epidemiological investigations, and tighten the community control network through strict grid-based management. [19.6] [Backing] Screening must be comprehensive; confirmed cases must be admitted, suspected cases tested, close contacts quarantined, and the "Four Earlies" enforced with no loopholes.

[19.7] [Qualifier] Strict controls must remain in place for outbound travel from Wuhan and Hubei. [19.8] [Backing] Efforts must also focus on treating severe cases, accelerating the use of effective treatment plans, integrating traditional Chinese and Western medicine, and

prioritising effective drugs and equipment. High-level medical teams must be deployed effectively in critical areas.

[19.9] [Backing] We must strengthen epidemic prevention in counties and rural areas to avoid risks of people "bringing the virus to the countryside" or "returning to cities while infected." [19.10] [Backing] Guidance and resources must be allocated accordingly, and legal compliance in epidemic prevention must be strictly followed.

[20] [Subtitle] 2. Ensure effective epidemic control in Beijing.

[20.1] [Claim] The safety and stability of the capital are of utmost importance to the overall work of the Party and the nation. [20.2] [Grounds] Strictly guard against both external importation and internal spread. [20.3] [Backing] Control the entry points to the city, strengthen health monitoring and personnel management, and reinforce joint prevention and control efforts in the Beijing-Tianjin-Hebei region. Other provinces should provide support as needed. [20.4] [Backing] Critical personnel must be ensured sufficient supplies, and the central response mechanism must provide timely coordination and support.

[21] [Subtitle] 3. Allocate medical resources and essential supplies wisely.

[21.1] [Backing] As the saying goes, "Use medicine like deploying troops, use doctors like deploying generals." [21.2] [Warrant] Medical personnel are the backbone of victory against the virus, and their protection must be taken seriously. [21.3] [Grounds] Over 2,000 healthcare workers have been infected, and some have died in service, which is deeply distressing. [21.4] [Backing] Recently, I stressed the importance of ensuring the safety and orderly deployment of medical teams in Hubei (especially Wuhan), with scientific coordination and logistical support. [22] [Claim] Frontline workers must be well protected, given necessary breaks, mental health support, and proper remuneration. [22.1] [Grounds] All infected medical staff must receive free treatment, and sacrifices must be minimised. [22.2] [Backing] Policies must be introduced quickly to care for frontline workers, including free health checks, more paid leave, and recognising anti-epidemic contributions in professional assessments. [23] [Claim] Critical supplies remain tight in Hubei and Wuhan. [23.1] [Grounds] Domestic production should be expanded, and supply chains maintained, including transport and logistics, to resolve "last-mile" delivery issues for daily essentials.

[24] [Subtitle] 4. Accelerate scientific and technological research.

[24.1] [Grounds] As COVID-19 is a new infectious disease, our understanding remains limited. [24.2] [Claim] We must mobilise multidisciplinary research to better understand sources and transmission mechanisms, support work resumption, and develop targeted guidelines. [24.3] [Warrant] Drug and vaccine development must progress with clinical practice. [24.4] [Backing] Research institutes, universities, and enterprises must collaborate to promote clinical breakthroughs safely and effectively. [24.5] [Backing] Big data and analytics should also be utilised to support epidemic prevention.

[25] [Subtitle] 5. Expand international and regional cooperation.

[25.1] [Grounds] Public health security is a common global challenge.

[25.2] [Claim] We must maintain communication with the World Health Organization, share experience with other nations, strengthen international cooperation in drug and vaccine development, and provide aid to countries and regions in need, reflecting our responsibility as a major country.

[26] [Subtitle] 6. Improve media and public communication.

[26.1] [Claim] We must continue publicising major Party decisions and effective local practices. [26.2] [Warrant] Epidemic updates must be open, transparent, timely, and accurate. [26.3] [Backing] Frontline stories of medical workers, military personnel, police officers, and volunteers should be highlighted to foster a positive, united social atmosphere. [26.4] [Grounds] We must adapt to new media trends, enhance mainstream media's online communication, and respond actively to public concerns. [26.5] [Qualifier/Rebuttal] Constructive feedback should be welcomed, but malicious attacks must be addressed according to law.

[27] [Subtitle] 7. Safeguard social stability.

[27.1] [Claim] Some strict control measures have been essential, but at this stage—excluding areas with high epidemic burdens like Hubei and Wuhan—we must aim for minimal disruption to people's lives. [27.2] [Backing] Conflict resolution mechanisms should be improved to identify and defuse potential social tensions early. Psychological support must be offered, and compassion shown to confirmed patients, quarantined individuals, and their families. [27.3] [Warrant] Offenders disrupting healthcare, market, and public order must be punished in accordance with the law.

[28] [Subtitle] Coordinated Promotion of Epidemic Prevention and Control and Economic and Social Development

[28.1] [Grounds] The economy and society function as a dynamic and cyclical system that cannot be suspended for an extended period. [28.2] [Claim] On the premise that epidemic prevention and control are effectively ensured, advancing the resumption of work and production in areas not severely affected by the outbreak is vital. [28.3] [Warrant/Backing] Doing so supports epidemic control with necessary material resources, safeguards livelihoods and social stability, contributes to the achievement of this year's economic and social development goals, ensures the full completion of a moderately prosperous society, fulfils the objectives of the 13th Five-Year Plan, and helps maintain China's openness and global economic stability.

[29] [Grounds] The COVID-19 pandemic has inevitably posed a significant shock to the economy and society. [29.1] [Warrant] At such a time, it is even more important to view China's development through a comprehensive, dialectical, and long-term lens, to bolster and maintain confidence. [29.2] [Backing] Overall, the long-term positive fundamentals of China's economy remain unchanged. [29.3] [Qualifier] The epidemic's impact is short-term and manageable. [29.4] [Claim] As long as we turn pressure into motivation and crises into opportunities, restore order in a coordinated way, strengthen the "six stabilities" (employment, finance, trade, foreign investment, domestic investment, and expectations), increase policy support, and fully unleash the potential and momentum of development, we can achieve this year's economic and social development goals.

[30] [Subtitle] Implement targeted and tiered resumption of work and production

[30.1] [Grounds] Following the outbreak, a major challenge was rapidly coordinating national resources to combat the epidemic. [30.2] [Warrant] Now that the situation is easing, the new challenge lies in balancing epidemic control with economic recovery. [30.3] [Qualifier] We must avoid adopting a one-size-fits-all approach that hinders normal life, while also preventing premature relaxation that could undo previous gains.

[31] [Claim] At the Politburo Standing Committee meeting on 12 February, I proposed differentiated prevention strategies based on regional risk levels. [31.1] [Grounds] Currently, 1,396 counties (46%) have reported no confirmed cases, and many others have low or no recent cases. [31.2] [Backing] These low-risk areas should swiftly shift focus to preventing imported cases and fully resume normal activities. [31.3] [Backing] Medium-risk areas

should resume work in an orderly manner according to local conditions. [31.4] [Backing] High-risk areas must continue to prioritise epidemic control. [31.5] [Backing] Provinces where conditions permit should lower their response levels and adopt dynamic adjustments.

[32] [Subtitle] Intensify macroeconomic policy adjustments

[32.1] [Claim] Counter-cyclical macro policies should be strengthened to offset the pandemic's impact, keeping economic performance within a reasonable range and preventing short-term shocks from becoming long-term trends.

[32.2] [Warrant] Proactive fiscal policy must be more assertive. [32.3] [Backing] Existing measures such as interest subsidies, fee reductions, and deferred tax payments must be implemented promptly. We should further introduce targeted, temporary tax and fee relief policies, supporting sectors most affected by the epidemic, especially SMEs. [32.4] [Backing] Part of the central government's funds should be reallocated to support epidemic control and essential expenditures. [32.5] [Backing] For local governments facing revenue shortfalls, transfer payments must be increased to ensure salaries, operations, and basic services are maintained. [32.6] [Backing] Local government special bond quotas should be expanded, and investment structures optimised.

[32.7] [Warrant] Prudent monetary policy should be more flexible and targeted, focusing on supporting the real economy. [32.8] [Backing] Existing financial measures must be used effectively, and new policies introduced as necessary. [32.9] [Grounds] Urgent issues such as debt servicing, liquidity, and financing for businesses must be addressed. [32.10] [Backing] Additional credit should be allocated to key epidemic areas, and special loan programmes established for heavily affected industries and SMEs. [32.11] [Backing] Loan repayments should be deferred where necessary, and interest on small business loans reduced to prevent liquidity crises.

[33] [Subtitle] Strengthen employment support across the board

[33.1] [Claim] An employment-first policy must be implemented with agile adjustments based on labour market trends. [33.2] [Warrant] Measures should simultaneously reduce burdens, stabilise jobs, and expand employment. [33.3] [Backing] Implementation of temporary reductions in social insurance contributions, unemployment insurance refunds, and employment subsidies must be accelerated.

[33.4] [Backing] To resolve labour shortages and help stabilise jobs, tailored support must be provided to enterprises, sectors, and vulnerable groups. [33.5] [Grounds] Migrant workers in low-risk areas should be encouraged to return to work via "point-to-point" transport services. [33.6] [Backing] Flexible and diversified employment channels should be supported, helping self-employed workers resume business. [33.7] [Backing] Online registration for unemployment and benefit claims must be expedited to ensure timely support. [33.8] [Backing] Special attention should be given to university graduates through coordinated arrangements for graduation, recruitment, and civil service exams, helping them enter the job market smoothly.

[34][Subtitle] Complete the poverty alleviation mission

[34.1] [Grounds] This year marks the final stage of the national poverty alleviation campaign. [34.2] [Qualifier] Though challenges were already significant, they have been compounded by the epidemic. We must now redouble efforts and ensure all tasks are fulfilled.

[34.3] [Claim] Migrant labour dispatch and reception must be accurately matched to support the orderly return of impoverished workers. [34.4] [Backing] Leading enterprises and workshops involved in poverty alleviation must resume operations promptly to create local jobs. [34.5] [Backing] Production and marketing channels for agricultural goods must be restored to prevent unsold stock. [34.6] [Backing] Anti-relapse mechanisms must be accelerated, with timely assistance provided to those who fall back into poverty due to the epidemic.

[35] [Subtitle] Promote full recovery of enterprise operations

[35.1] [Claim] Following the principle of differentiated prevention and control, bottlenecks in labour and logistics must be cleared. [35.2] [Grounds] Freight restrictions must be eased to ensure workers return, raw materials are supplied, and products are distributed.

[35.3] [Warrant] Given that industrial chains are highly interdependent, coordination across regions is essential to synchronise production in upstream and downstream sectors. [35.4] [Backing] Effective domestic demand should be expanded by accelerating the progress of ongoing and new construction projects, with guarantees for labour, land, and financing.

[35.5] [Backing] Support should be drawn from central investment funds, special bonds, and policy banks. [35.6] [Qualifier] The epidemic presents both risks and opportunities.

[35.7] [Grounds] While some traditional sectors suffer, emerging sectors such as smart manufacturing, contactless delivery, online services, and healthcare are demonstrating robust growth potential. [35.8] [Backing] We should take this opportunity to upgrade traditional industries and foster the development of new ones.

[36] [Subtitle] Secure spring agricultural production

[36.1] [Grounds] Spring ploughing is underway across the country. [36.2] [Claim] Outstanding issues affecting preparation must be resolved quickly. [36.3] [Backing] Agricultural supplies must be produced and distributed effectively, and spring sowing carried out on time.

[36.4] [Qualifier] Even in areas hardest hit by the epidemic such as Hubei, farming should proceed where feasible.[36.5] [Warrant] As most agricultural work is outdoors, unjustified restrictions should be lifted to avoid delays. [36.6] [Backing] Efforts must also continue to control major animal diseases such as African swine fever and avian influenza, while advancing the development of livestock and aquaculture industries.

[37] [Subtitle] Safeguard basic livelihoods

[37.1] [Grounds] The epidemic has impacted household incomes and, combined with rising prices, may worsen difficulties for some groups. [37.2] [Claim] The "rice bag" and "vegetable basket" responsibility systems must be enforced to guarantee food supply. [37.3] [Backing] Market monitoring and distribution must be improved to avoid excessive inflation in daily necessities.

[37.4] [Warrant] Essential services must remain accessible during the epidemic. [37.5] [Backing] Service sectors closely tied to people's lives should resume operations in an orderly manner. [37.6] [Backing] Social safety nets for vulnerable populations must be reinforced, and temporary price subsidies adjusted where necessary. [37.7] [Backing] Households affected by infection or loss must be supported with essential services.

[37.8] [Grounds] Special attention should be given to isolated elderly individuals, children in difficulty, and people with serious illness or disabilities. [37.9] [Backing] Regular visits and assistance should be provided to prevent socially unacceptable incidents. [37.10] [Backing] Other non-COVID patients must also be cared for, ensuring adequate treatment for emergencies, access to chronic disease medication, and channels for routine care.

[38] [Subtitle] Stabilise foreign trade and foreign investment

[38.1] [Claim] To maintain international market share, industrial and supply chains must operate smoothly. [38.2] [Backing] Export tax rebates, export credit insurance, and related trade finance tools should be fully utilised. [38.3] [Backing] Underwriting conditions must be relaxed, customs procedures streamlined, and logistics costs reduced.

[38.4] [Warrant] Foreign trade and investment should be expanded in tandem. [38.5] [Backing] Major foreign-invested projects must be implemented as scheduled. [38.6] [Backing] Services such as finance should be opened further. [38.7] [Backing] The business environment must continue to improve, and investor confidence reinforced through proactive investment promotion and support measures.

[39] [Subtitle] (3) Strengthening the Party's Leadership in Coordinating Epidemic Prevention and Control with Economic and Social Development

[39.1] [Backing] As the saying goes, "It is in turbulent seas that we see the true character of a hero." [39.2] [Grounds] In this tough battle, whether we can secure victory in this people's war, in the general battle, and in the critical battle against the epidemic, is a major test of all levels of Party organisations and Party members and cadres. [39.3] [Claim] Party organisations at all levels must earnestly fulfil their leadership responsibilities, particularly the responsibility for implementation. [39.4] [Backing] They must ensure the Party Central Committee's decisions and deployments are fully and accurately carried out on the ground, ensuring the Party flag flies high on the front line of epidemic prevention and control.

[40] [Warrant] Whether a cadre is politically competent is revealed in critical moments. [40.1] [Backing] Overall, our team of cadres has proven up to the challenge in this fight, but a minority have performed poorly, and some very badly. [40.2] [Grounds] Some shirk responsibility and fear taking initiative, doing nothing unless explicitly instructed from above. [40.3] [Grounds] Some are sluggish and disorganised, unclear about the situation and lacking any coherent approach. [40.4] [Grounds] Others go through the motions with a perfunctory and superficial work style, engaging in formalism and bureaucratism. [40.5] [Grounds] Still others dodge their duties or even flee the front lines. Such behaviour is extremely irresponsible to the Party and the people, and cannot be tolerated. [40.6] [Claim] It must be firmly corrected!

[41] [Claim] A true Communist steps up in critical moments and stands strong in times of adversity. [41.1] [Warrant] In coordinating epidemic prevention with economic and social development, cadres — especially leading ones — must bolster their resolve and display the indomitable revolutionary spirit to overcome all enemies without yielding. [41.2] [Backing] They must take the lead, face the front line head-on, and show through their actions the political character of a true Communist.

[42] [Backing] They must strengthen their sense of responsibility, put their original aspirations into action and their mission on their shoulders, fulfil their duties with diligence and initiative. They must strengthen their compassion and concern for the people, listen to their needs and worries, and solve their pressing problems. [42.1] [Backing] They must enhance their prudence, maintain bottom-line thinking, and persist in addressing issues thoroughly, staying vigilant and rigorous until final victory is secured.

[43] [Claim] Party organisations at all levels must assess and identify cadres on the front lines. [43.1] [Backing] Those who perform exceptionally should be commended and boldly promoted. [43.2] [Warrant] Those who evade responsibility or are derelict in their duties should be held strictly accountable. [43.3] [Backing] Those who abandon their posts in critical moments should be dismissed on the spot. [43.4] [Backing] Outstanding Party members, cadres, and collectives must be widely recognised and publicised. [43.5] [Backing] Activists who demonstrate exceptional performance on the front lines should be fast-tracked for Party membership. [43.6] [Backing] Commendations and awards must be issued by the Party Central Committee, the State Council, the Central Military Commission, and other relevant authorities in accordance with the level and scope of their contributions.

[44] [Claim] The grassroots level is the first line of defence for joint prevention and control and the first front in resuming work and production. It is key to ensuring that all measures are effectively implemented. [44.1] [Backing] Grassroots Party organisations and cadres must mobilise, organise, and unite the people, fully enforce joint prevention and control measures, and build a strong, community-based defence line. [44.2] [Backing] They must patiently and carefully carry out ideological work, guiding the public to understand the bigger picture, comply with epidemic prevention rules, and voluntarily maintain social order.

[44.3] [Grounds] Grassroots cadres and those deployed to the front line — especially in severely affected areas such as Hubei and Wuhan — have worked continuously and tirelessly. [44.4] [Claim] Party committees and governments at all levels must care for them, help them

resolve practical difficulties, and deploy more personnel from upper-level organs and institutions to support grassroots efforts. [44.5] [Backing] Duplication of tasks and excessive reporting requirements at the grassroots level must be avoided. [44.6] [Warrant] Formalism and bureaucratism must be decisively rectified to allow frontline workers to focus their energy where it is most needed.

[44.7] [Claim] Winning this people's war against the epidemic relies firmly on the people. [44.8] [Warrant] Communities are the critical line of defence in joint prevention and control. [44.9] [Backing] We must ensure that both resources and manpower are directed to the grassroots to secure community-level prevention. [44.10] [Backing] Mass organisations such as trade unions, the Communist Youth League, and the Women's Federation must mobilise their respective constituencies to participate actively. [44.11] [Backing] We must guide and support broader social participation, giving clear direction and opening up channels for engagement. [44.12] [Backing] Industry associations and chambers of commerce must help their member enterprises resume production while preventing infection. [44.13] [Backing] The professional expertise of social workers must be brought to bear, supporting psychological counselling, emotional aid, and logistical support. [44.14] [Backing] Charitable organisations and the Red Cross must function efficiently, operate transparently, and accept public supervision, ensuring every act of kindness is delivered swiftly and effectively.

[45] [Grounds] This epidemic has revealed shortcomings in China's public health emergency response mechanisms. [45.1] [Claim] We must summarise the experience, draw lessons, and accelerate research into key systemic improvements: strengthening the legal foundations for public health, reforming and enhancing disease control and prevention systems, upgrading emergency response and treatment systems, and improving medical insurance and assistance systems for major illnesses. [45.2] [Backing] We must also establish a unified emergency supply system. [45.3] [Warrant] Gaps must be closed, weaknesses addressed, and capacities improved to raise the country's ability to respond to major public health emergencies.

[46] [Claim] We must uphold a preventative approach to health and hygiene, vigorously promote the Patriotic Health Campaign, strengthen the public health workforce, improve grassroots capacity, and integrate medical care with prevention — resolving issues at their earliest stages before they escalate.

Conclusion

[47] Finally, I would like to make three requests to all comrades attending today's meeting:

[47.1] First, ensure thorough implementation. [47.2] This year, we face rising risks and challenges, compounded by the epidemic. Accomplishing economic and social development goals will be harder than ever. [47.3] We must remain unwavering in our commitment, focus on problem-solving, and tackle issues one by one, layer by layer, ensuring work is truly done on the ground.

[47.4] Second, raise awareness of potential risks. [47.5] I have emphasised this many times. [47.6] Back in January 2018, during a seminar on studying and implementing the spirit of the 19th Party Congress, I highlighted eight categories of 16 specific risks — including the threat of major infectious diseases like SARS. We must maintain a sense of cautious vigilance, remain acutely aware of potential crises, and stay alert to both sectoral and national risks, offering advice and solutions at the first signs of trouble.

[48] Third, enhance our competence. [48.1] The epidemic has shown that some leading cadres still lack the necessary governance skills and professional capabilities — this must be taken seriously. [48.2] We must improve our overall competence, develop mastery in our areas of responsibility, and become truly knowledgeable leaders.

[49] Comrades!

[49.1] The Chinese nation has endured countless hardships throughout history — yet it has never been crushed. Instead, we have only grown stronger, rising again and again from adversity. [50] I firmly believe that with the strong leadership of the Party Central Committee, the great institutional strengths of socialism with Chinese characteristics, our vast capacity for mobilisation and deep national strength, and with the unity and perseverance of the whole Party, the military, and all our people, we will defeat this epidemic, maintain positive momentum in our economic and social development, and realise the goals of completing the building of a moderately prosperous society and winning the battle against poverty.

[G1-CN-Text 2] *Xi Jinping: Speech at the National Commendation Conference for the Fight Against COVID-19*

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Confrontation

[1] Comrades, Friends,

[1.1] Over the past eight months, our Party has united and led the people of all ethnic groups across the country in an intense and heroic battle against the COVID-19 epidemic. [1.2] We have withstood an extraordinarily arduous historical test, made tremendous efforts, and achieved a major strategic victory in the fight against the virus. [1.3] It is a magnificent feat in the history of humankind's struggle against disease.

[2] Today, we are holding a grand National Commendation Conference for Fighting COVID-19, to award the Medal of the Republic and the National Honour Medal to exemplary individuals, and to recognise outstanding individuals and collectives for their contributions to epidemic prevention and control. [2.1] We are here to promote the great anti-epidemic spirit and to continue striving toward the full establishment of a moderately prosperous society and the great success of socialism with Chinese characteristics in the new era.

[3] On behalf of the CPC Central Committee, the State Council, and the Central Military Commission, I extend the highest respect to the honoured individuals and collectives, and to all those who made significant contributions to the fight against the epidemic: medical workers, disease control personnel, members of the People's Liberation Army, officers and soldiers of the armed police, scientific researchers, community workers, police officers, emergency rescue teams, journalists, employees of enterprises and public institutions, construction workers, officials dispatched to the grassroots, volunteers, and the broad masses of the people. [3.1] I also salute Party members and cadres at all levels across government and institutions.

[4] I express sincere thanks to the democratic parties, the Federation of Industry and Commerce, non-party affiliated individuals, people's organisations, and all sectors of society who actively participated in the epidemic response. [4.1] Heartfelt thanks also go to compatriots in Hong Kong, Macao, and Taiwan, and to overseas Chinese nationals who offered generous support.

[4.2] During China's battle against the epidemic, many world leaders, governments, political parties, social organisations, diplomatic missions, UN agencies, regional and international organisations, foreign enterprises, and international friends expressed their sincere support to the Chinese people in various forms. [4.3] On behalf of the Chinese government and the people, I extend our heartfelt gratitude to them.

Opening

[5] At present, COVID-19 continues to ravage the world. [5.1] The Chinese people share the pain and suffering of other nations, deeply mourn the lives lost to the virus, pay the highest tribute to those racing against time to fight the epidemic and save lives, and extend our sincere wishes to those infected and undergoing treatment.

[5.2] At this moment, we especially remember and mourn with deep sorrow the martyrs who gave their lives in the line of duty and the fellow citizens who sadly passed away during the epidemic.

Argumentation

[6] [Claim] Comrades, Friends.

[6.1] [Grounds] COVID-19 is the most severe global pandemic in a century and the most rapidly spreading, widely affecting, and hardest to control public health emergency China has faced since the founding of the People's Republic.

[6.2] [Grounds] The virus struck suddenly and fiercely, posing a grave threat to the safety and health of our people. [6.3] [Warrant] We adhered to the principle of putting people and life first, and with firm courage and unwavering resolve, raced against time and fought a fierce battle against the virus. [6.4] [Backing] We swiftly launched a people's war, an all-out battle, and a blockade battle for epidemic control.

[7] [Grounds] In just over one month, we initially curbed the spread of the epidemic. In about two months, we brought new daily local cases down to single digits. [7.1] [Backing] And in about three months, we achieved decisive victories in the Wuhan and Hubei battles. [7.2] [Backing] Subsequently, we launched and won several annihilation battles against local cluster outbreaks, securing major strategic achievements in our national fight against the epidemic.

[8] [Warrant] On this foundation, we coordinated epidemic control with economic and social development, and rapidly restored the normal order of production and life, achieving notable results. [8.1] [Backing] China's fight against the epidemic has fully demonstrated the Chinese spirit, the strength of China, and China's sense of responsibility.

[9] [Grounds] In the face of a sudden and severe outbreak, the Party Central Committee exercised overall leadership and made decisive decisions, responding to an extraordinary

event with extraordinary measures. [10] [Claim] Upholding the principle of putting the people's lives and health first, the Party Central Committee promptly implemented centralised and unified leadership. [10.1] [Backing] The Standing Committee of the Political Bureau and the Political Bureau of the CPC Central Committee convened 21 meetings to study and decide upon major measures, leading and organising a nationwide mobilisation involving the Party, government, military, civil society, academia, and regions across the country. [11] [Backing] The Party Central Committee put forward the general requirements of strengthening confidence, working in solidarity, adopting scientific prevention, and implementing targeted measures, and clearly set the overarching goals of resolutely curbing the spread of the virus and winning the battle against the epidemic. [11.1] [Backing] Strategic plans were meticulously formulated for the defence of Wuhan and Hubei, with major strategies and tactics adjusted in accordance with evolving circumstances.

[12] [Backing] We established the Central Leading Group for COVID-19 Response, dispatched the Central Guidance Group, and launched the State Council's joint prevention and control mechanism. [12.1] [Backing] We introduced the prevention and control requirements of early detection, early reporting, early isolation, and early treatment, and the treatment strategy of centralising patients, experts, resources, and treatment efforts. [12.2] [Backing] Increasing the admission and recovery rates while reducing infection and mortality rates was made a top priority.

[13] [Claim] We made every effort to treat patients, leaving no infected individual unattended and not giving up on a single patient. [13.1] [Backing] Integrated traditional Chinese and Western medicine approaches were applied, and all treatment costs were covered by the state, which significantly raised the cure rate and reduced the fatality rate. [14] [Backing] We emphasised the coordination between scientific research, clinical treatment, and epidemic control, swiftly developing nucleic acid test kits and accelerating the screening of effective drugs and vaccine development, fully utilising science and technology to support epidemic response.

[15] [Backing] A national information release mechanism was quickly established to ensure epidemic updates were released in an objective, truthful, open, and transparent manner.

[16] [Claim] We remained constantly concerned about the safety and well-being of Chinese citizens overseas, making every effort to protect their health and daily lives.

[16.1] [Backing] Health kits were distributed to groups such as international students, and support was offered to help citizens with genuine difficulties return to China in an orderly manner. [17] [Claim] As the situation evolved, we promptly adjusted the national strategy from emergency-level control to a longer-term approach, shifting the focus to preventing imported cases and domestic resurgence, and promoted a transition from emergency response to routine epidemic control. [17.1] [Backing] We improved mechanisms for timely detection, rapid response, precise management, and effective treatment.

[18] [Grounds] All Party committees, governments, departments, and units at various levels acted swiftly upon orders. [18.1] [Backing] Across the country, rural areas, communities, enterprises, medical and health institutions, research bodies, schools, and military camps all took their positions and fulfilled their duties.

[18.2] [Backing] Under the strong leadership of the Party Central Committee, a national strategy characterised by unified command, comprehensive deployment, and three-dimensional control quickly took shape. [18.3] [Backing] This effectively curbed the widespread transmission of the virus, significantly altered the trajectory of its spread, and maximised the protection of people's lives and health.

[19] [Claim] In the face of a sudden and severe outbreak, the Chinese people stood united through storm and stress, forging an unbreakable line of defence against the epidemic.

[20] [Grounds] Wuhan and Hubei became the main battleground in the fight against COVID-19. [20.1] [Backing] Victory in Wuhan meant victory in Hubei; victory in Hubei meant victory for the entire nation. When disaster struck in one region, support poured in from all directions.

[21] [Backing] With the strength of the entire country, we launched an unprecedented large-scale life-saving mission. [21.2] [Backing] In just over ten days, Huoshenshan and Leishenshan Hospitals were constructed, 16 makeshift Fangcang hospitals were rapidly transformed, and more than 600 centralised quarantine sites were swiftly established. [21.3] [Backing] Nineteen provinces and municipalities provided paired assistance to 16 cities and prefectures outside Wuhan, deploying the most capable personnel, the most urgently needed resources, and the most advanced equipment, achieving a rapid shift from scarcity to dynamic equilibrium in medical resources and supply.

[22] [Backing] People from all walks of life rose to the occasion. [22.1] [Backing] State-owned enterprises and public hospitals took on great responsibilities. [22.2] [Backing] Over 4.6 million grassroots Party organisations charged to the frontlines, and more than 4 million community workers kept watch day and night in 650,000 urban and rural communities across the country. [23] [Backing] Private enterprises, non-public hospitals, charitable organisations, nursing homes, and welfare institutions all contributed actively. [23.1] [Backing] Party members and officials led by example and fought tirelessly. [23.2] [Backing] Soldiers of the People's Liberation Army, officers of the Armed Police and the public security forces bravely stepped forward. [23.3] [Backing] Scientific researchers worked around the clock. [23.4] [Backing] Millions of couriers risked exposure to deliver supplies, while 1.8 million sanitation workers laboured from dawn to dusk. Journalists reported from the front lines. [23.5] [Backing] Countless volunteers and ordinary citizens gave selflessly in silence.

[24] [Rebuttal] The whole country cheered for Wuhan. [24.1] [Backing] "Let's cheer for reganmian (hot dry noodles)!" People called together: "All of China is waiting for you to recover! let's enjoy the cherry blossoms together in spring!" [24.2] [Backing] And the patients in Wuhan responded undauntedly: "Thank you for not giving up on us. [24.3] [Backing] Once I recover, I will donate my blood."

[24.4] [Backing] The resounding cry echoed across the land: "Wuhan will win, Hubei will win, China will win."

[25] [Claim] The people of Wuhan and Hubei put the overall situation above all else. [25.1] [Backing] They were courageous and resilient, willingly making sacrifices and fully cooperating with epidemic control efforts. [25.2] [Backing] Their selfless dedication bought crucial time and strategic initiative for the national fight against the virus. [25.3] [Backing] Their enormous sacrifices and major contributions will forever be remembered.

[26] [Grounds] In the face of a sudden and severe epidemic, countless medical workers donned white coats as armour and marched against the tide, risking their lives to save others.

[26.1] [Backing] Millions of medical professionals across the country fought bravely on the front lines of the epidemic, bringing light to the long night of the virus's rampage. [26.2] [Backing] Their life-and-death rescue efforts were profoundly moving and awe-inspiring. [27] [Backing] In Hubei Province and Wuhan City alone, 540,000 medical workers confronted the virus head-on, initiating the first critical defensive battle against the outbreak. [27.1] [Backing] 346 national medical teams and more than 40,000 healthcare professionals

resolutely headed to the front lines—many departed on Chinese New Year's Eve, when families traditionally reunite.

[28] [Backing] Medical personnel of the People's Liberation Army remembered their mission, treating the epidemic as an order. [28.1] [Backing] Once called, they responded swiftly, fought valiantly, and fulfilled their duties with distinction.

[29] [Backing] With deep devotion to the people and reverence for life, our medical workers raced against time, fought tirelessly, and endured both physical and psychological extremes. [29.1] [Backing] Many had deep wounds and sores on their faces from tightly worn masks. [29.2] [Backing] Some had their hands whitened and blistered after being soaked in sweat for long hours. [29.3] [Backing] And some comrades even sacrificed their lives in the line of duty. [30] [Claim] They used their flesh and blood to build an iron wall against the virus, saving countless lives from the brink of death. [30.1] [Backing] They fully embodied the noble spirit of "a healer's benevolence" and boundless love.

[31] [Claim] China's medical professionals have shown remarkable responsibility.

[32] [Backing] Comrade Zhang Dingyu, who suffers from ALS (Lou Gehrig's disease), said: "I must run faster to save more patients from the clutches of the virus."

[32.1] [Backing] At the same time, they remained humble.

[32.2] [Backing] Comrade Zhong Nanshan said: "In truth, I am just a doctor who sees patients."

[32.3] [Backing] The people said: "As long as you are here, we feel safe."

[32.4] [Backing] Our medical workers are the most beautiful angels.

[32.5] [Backing] They are the most admirable people of our time!

[32.6] [Backing] Their names and their contributions will never be forgotten by the nation, the people, or history.

[32.7] [Backing] They will be forever engraved on the monument of the People's Republic.

[32.8] [Warrant] In the face of a sudden and severe epidemic, we took a well-coordinated and holistic approach, leading to a stable recovery in economic development and a steady return to normalcy in daily life. [33] [Claim] We accurately assessed the evolving epidemic situation, maintained a global and strategic perspective, and made timely and major decisions

to coordinate epidemic prevention and control with economic and social development. [33.1] [Backing] By adhering to law-based and science-based approaches, we promoted precise, region-specific, and tiered resumption of work and production, ensuring the maximum possible protection of people's livelihoods and daily needs.

[34] [Grounds] We intensified macro policy responses, steadfastly carried out the "Six Stabilities" (stability in employment, finance, foreign trade, foreign investment, domestic investment, and market expectations) and fully implemented the "Six Guarantees" (guaranteeing employment, basic livelihood, market entities, food and energy security, stable supply chains, and grassroots operations). [34.1] [Backing] A series of relief and support policies were introduced to assist enterprises, strengthen employment-first initiatives, stimulate investment and consumption, stabilise foreign trade and investment, and secure industrial and supply chains. [35] [Backing] New business models and formats were actively promoted. Sectors such as transportation, catering, retail, culture, and tourism resumed operations in an orderly manner. [35.1] [Backing] A comprehensive support package was implemented to promote the recovery and development of Hubei Province. School reopening was carried out in phased and structured steps.

[36] [Backing] We advanced poverty alleviation with greater determination and stronger actions. [36.1] [Backing] Industrial recovery in impoverished regions was supported, and priority was given to ensuring employment for workers from poor households, effectively preventing poverty caused or worsened by the pandemic.

[37] [Claim] China became the first major economy to resume growth since the onset of the pandemic. [37.1] [Backing] We achieved leading results in both epidemic control and economic recovery, demonstrating the nation's strong resilience and vigorous vitality. [37.2] [Backing] In the face of the sudden and severe pandemic, China joined hands with countries around the world to overcome difficulties together, contributing both wisdom and strength to the global fight against COVID-19.

[38] [Claim] Adhering to a spirit of openness, transparency, and responsibility, China actively fulfilled its international obligations. [38.1] [Backing] At the earliest possible time, we notified the World Health Organisation (WHO), relevant countries, and regional organisations of the outbreak. We released the genetic sequence of the novel coronavirus. [38.2] [Backing] We published treatment protocols and prevention and control plans. [38.3] [Backing] We held over 70 exchanges with many countries, as well as with international and regional

organisations on epidemic control. [38.4] [Backing] We launched an online COVID-19 knowledge centre and made it accessible to all countries. [38.5] [Backing] And we shared all prevention and treatment experiences with full transparency and without reservation.

[39] [Claim] Even when facing tremendous pressure in our domestic epidemic control efforts, we did our utmost to assist the international community. [39.1] [Backing] We announced two cash donations totalling $50 million to the WHO. [39.2] [Backing] We dispatched 34 medical expert teams to 32 countries. [39.3] [Backing] We provided 283 batches of anti-epidemic supplies to 150 countries and 4 international organisations. [39.4] [Backing] We supplied and exported medical materials to more than 200 countries and regions. [40] [Grounds] Between March 15 and September 6, China exported 151.5 billion face masks, 1.4 billion protective suits, 230 million goggles, 209,000 ventilators, 470 million testing kits, and 80.14 million infrared thermometers.

[40.1] [Backing] These efforts significantly supported global epidemic control.

[40.2] [Warrant] We actively advocated for building a global community of health for all, and proposed a series of initiatives in areas such as international assistance and equitable access to vaccines. [40.3] [Claim] With concrete actions, China helped save countless lives around the world, demonstrating its sincere commitment to building a community with a shared future for mankind.

[41] [Claim] Comrades and friends!

[41.1] [Grounds] The younger generation represents the hope of the nation and the future of the people. During this battle against COVID-19, the outstanding performance of our younger generation has been both heartening and inspiring. [41.2] [Backing] Nearly half of the medical personnel involved in the fight were born in the 1990s and 2000s. [41.3] [Backing] They moved the whole country with one sentence: "You protected us during SARS in 2003, now it's our turn to protect you." The older generation said, "There are no angels in white, just a group of kids who changed into a uniform." [41.4] [Warrant] There are no born heroes; they emerge from ordinary people who step forward in times of crisis. [41.5] [Backing] These young people feared neither hardship nor sacrifice, shouldering enormous responsibilities with courage, demonstrating the vitality of youth and the hope of the Chinese nation. [41.6] [Qualifier] Let us all give them a heartfelt round of applause!

[42] [Claim] Comrades and friends!

[42.1] [Grounds] Our major strategic achievements in combating COVID-19 fully demonstrate the leadership of the Communist Party of China, the superiority of the socialist system, the strength of the Chinese people and nation, the profound foundation of Chinese civilisation, and the moral responsibility of a major power. [42.2] [Backing] These achievements have significantly enhanced the confidence, pride, cohesion, and unity of our people and will inspire us to move forward courageously on the new journey of the new era.

[43] [Claim] In the life-and-death battle against the pandemic, the Chinese people and nation demonstrated an indomitable spirit, forging the great spirit of combating COVID-19, characterised by putting people and life first.

[43.1] [Backing] This reflects the deep traditional humanitarian values of the Chinese people and the people-centred philosophy of the Communist Party of China.

[43.2] [Backing] "To love others and benefit all things is called benevolence."

[44] [Claim] Human life is the most precious; once lost, it can never be returned. [44.1] [Grounds] We took unprecedented measures, such as locking down Wuhan and Hubei, with enormous political courage, to protect every life, from a newborn only 30 hours old to a centenarian, whether Chinese or of other nationalities. [44.2] [Backing] This exemplifies the governing philosophy of serving the people, the moral conviction that life is paramount, and the great respect for life and dignity at the core of Chinese civilisation. [44.3] [Warrant] This spirit demonstrates the power of unity in the face of adversity. [44.4] [Backing] Across the country, people stood together, shared weal and woe, and contributed in various ways. [44.5] [Backing] The colours of dedication, "angel white," "military green," "guardian blue," and "volunteer red," gathered quickly. [44.6] [Backing] The slogans "I'm a Party member; I'll go first" and "The virus won't retreat, neither will I" rang out across the land. Over 1.4 billion Chinese stood shoulder to shoulder, weaving a powerful tapestry of unity and strength.

[45] [Claim] This spirit reveals the fearless will of the Chinese people. [45.1] [Backing] Heroes rose up in all fields. [45.2] [Backing] Doctors who gave up their chance of survival to treat others. Husbands who never fulfilled their wedding vows. [45.3] [Backing] Mothers who sacrificed their lives on the front line, leaving behind young children.

[46] [Warrant] Facing the virus, the Chinese people did not back down, but advanced courageously into danger, writing a heroic epic with ordinary lives.

[47] [Subtitle] Respect for Science

[47.1] [Claim] This reflects our pragmatic and innovative national character. [47.2] [Backing] With no effective medicine at hand, we integrated traditional Chinese and Western medicine, published eight versions of treatment guidelines, and developed "three medicines and three prescriptions" that proved effective and were adopted internationally.

[47.3] [Backing] From building Fangcang shelter hospitals, to developing vaccines along multiple technological paths, from mass nucleic acid testing and digital contact tracing, to differentiated control by region, our every move upheld scientific rigor and provided technological strength to win the battle.

[48] [Subtitle] Shared Future

[48.1] [Claim] This reflects the global moral responsibility and peace-loving nature of the Chinese people.

[48.2] [Backing] Embracing the concept of "One World, One Family," we not only protected our own people but also contributed to global public health. [48.3] [Backing] We launched the largest emergency humanitarian operation since the founding of the PRC, showcasing a major country's commitment to justice, compassion, and solidarity. [48.4] [Warrant] These actions powerfully demonstrated China's sincere desire to build a community with a shared future for mankind.

[49] [Subtitle] The Enduring Power of Spirit

[49.1] [Backing] "Without spirit, an individual cannot stand tall; without spirit, a nation cannot prosper."

[49.2] [Claim] This great anti-epidemic spirit is deeply rooted in the long-standing character and cultural genes of the Chinese nation. [49.3] [Backing] It carries forward the values of patriotism, collectivism, and socialism, enriches our national and contemporary ethos, and must be vigorously promoted across society. [49.4] [Warrant] We must transform it into a powerful force for realizing national rejuvenation.

[50] [Subtitle] Profound Lessons and Valuable Experience

[50.1] [Backing] "Only those who taste bitterness know its depth; only those who walk the path understand its challenges."

[50.2] [Claim] From this monumental struggle, we draw vital conclusions.

[51] [Subtitle] The Leadership of the CPC

[51.1] [Claim] The battle proves that the strong leadership of the Communist Party of China is the most reliable backbone of the Chinese people. [51.2] [Backing] With deep roots among the people, the CPC has always prioritized the people's interests. [51.3] [Grounds] Over 25,000 outstanding individuals joined the Party during this period. [51.4] [Warrant] Without this leadership, we could not have achieved our victories over natural disasters and crises.

[52] [Subtitle] The Willpower of the People

[52.1] [Claim] The Chinese people's resilience and perseverance are the source of all victories. [52.2] [Backing] Their spirit has enabled us to rise through centuries of hardship and to stand tall among the world's nations. [52.3] [Qualifier] We are all proud to be Chinese!

[53] [Subtitle] The Strength of the Socialist System

[53.1] [Claim] This battle once again highlights the remarkable organizational, mobilization, and coordination capabilities of our socialist system. [53.2] [Backing] In the face of crisis, we rallied the entire nation to act swiftly and effectively, showcasing the superiority of our national governance.

[54] [Subtitle] The Power of Comprehensive National Strength

[54.1] [Grounds] Thanks to the accumulated strength since the founding of the PRC, especially since reform and opening-up, we had the capacity to provide medical, logistical, and technological support rapidly. [54.2] [Claim] Even as much of society paused, daily life remained stable. This is the foundation of our confidence and resilience.

Conclusion

[55] So long as we stay true to our goals, uphold the Party's leadership, embrace the people, rely on our system's strengths, and enhance our national power, the ship of socialism with Chinese characteristics will ride the waves and sail steadily toward our great national rejuvenation.

[55.1] The great anti-epidemic practice has once again proven that the core socialist values and the outstanding traditional Chinese culture possess immense spiritual power, which serves as a powerful force for uniting the people and mobilising collective strength. [55.2] Cultural confidence is the most fundamental, profound, and enduring force in the

development of a nation. [55.3] A culture that aspires toward goodness and virtue forms a crucial bond connecting the fate and shared emotions of a people.

[56] The Chinese people have always upheld a strong sense of family and national responsibility. [56.1] They revere the principle of "the world belongs to all," advocate self-restraint and public service, believe that "every citizen bears responsibility for the fate of the nation," and promote unity in adversity, mutual assistance, care for the elderly and the young, and a balance between freedom and self-discipline, rights and responsibilities.

[57] In the fight against the pandemic, 1.4 billion Chinese people demonstrated a strong sense of responsibility, discipline, dedication, and solidarity, forging a powerful spiritual bulwark of unity and shared commitment.

[58] History and reality have both shown that so long as we cultivate and practise core socialist values and inherit and promote the essence of Chinese traditional culture, we will surely build a strong spiritual homeland for all ethnic groups across the country, and lay a solid ideological foundation for unity and forward momentum.

[59] The great practice of fighting COVID-19 has also once again proven the broad appeal of building a community with a shared future for mankind. [59.1] This is the right path for responding to shared challenges and for building a more prosperous and beautiful world.

[60] The pandemic has reminded humanity in a unique way that all people are part of one community with a shared future. [60.1] No country can remain unaffected in the face of major crises. [60.2] Solidarity and cooperation are the only correct choices.

[61] Any attempt to act selfishly, shift blame, distort facts, or create confusion harms not only one's own country and people, but also brings harm to people around the world.

[62] History and reality both show that as long as the international community adheres to the vision of a shared future for mankind, upholds multilateralism, and walks the path of solidarity and cooperation, people of all nations will be able to work together to tackle global problems and build a better home on Earth.

[63] Comrades and friends,

[63.1] At present, we are facing accelerating changes unseen in a century and arduous tasks in ensuring reform, development, and stability at home.

[64] At this historic juncture of advancing toward the "Two Centenary Goals," we must fully implement the Party's basic theories, line, and strategies; adhere to the general principle of seeking progress while maintaining stability; firmly implement the new development philosophy; actively build a new development paradigm; coordinate the overall domestic and international situations; and properly manage development and security. [64.1] We must modernise our national governance system and capacity to open up new prospects for the development of the Party and the country.

[65] We must remain vigilant in regular epidemic prevention and control, and strive to win a complete victory in the fight against COVID-19.

[66] Although significant progress has been made, the pandemic still rages globally, and sporadic and local outbreaks continue to pose risks within China.

[67] We must remain cautious and not let our guard down, ensuring we do not squander the hard-won results.

[68] We must combine regular precise prevention with localized emergency responses, increase efforts in medical and vaccine research, promote the Patriotic Health Campaign, and improve public health infrastructure.

[69] By fostering countless small, healthy environments, we will build a strong societal line of defence for long-term prevention and control.

[70] We must solidly implement the "Six Stabilities" and "Six Guarantees" to ensure victory in building a moderately prosperous society and eradicating poverty.

[71] We must strengthen confidence, make up for lost time, and recover from the impact of the pandemic.

[72] We will build mid- and long-term coordination mechanisms for prevention and socio-economic development, focusing on supply-side structural reform, expanding domestic demand, and stimulating market vitality.

[73] We will continue to support employment, education, healthcare, social security, and housing, while making targeted efforts to tackle poverty and ensure people's livelihoods.

[74] We must strengthen weak links in our governance system to safeguard lives and health through institutional measures.

[75] This pandemic has been a comprehensive test of our governance system and capacity.

[76] We must promptly plug loopholes, strengthen weak points, and improve emergency response capacity, including a robust public health system, integrated prevention and treatment mechanisms, a sound legal and scientific foundation, and a modern urban and community governance system.

[77] We must also enhance our biosafety awareness and defences.

[78] We must uphold the vision of a community with a shared future for mankind and work with the world to address global challenges.

[79] China will continue to promote international cooperation on pandemic control, support the WHO's leading role, share experience, and provide aid to countries in need.

[80] We will remain the world's largest supplier of anti-epidemic materials, and promote the construction of a global health community.

[81] We will deepen mutually beneficial cooperation, maintain global industrial and supply chain stability, and promote inclusive global governance, effective multilateralism, and active regional cooperation.

[82] We will work together to tackle global issues such as terrorism, climate change, cybersecurity, and biosafety, to create a better future for humanity.

[83] We must remain mindful of worst-case scenarios, enhance our awareness of potential risks, and effectively prevent and defuse challenges.

[84] Sunshine always comes after the storm. Opportunity and challenge coexist.

[85] The history of our Party, our nation, and reform has never been free of struggle.

[86] *"Those who do not seek ease will achieve; those who do not fear hardship will advance."*

[87] We must strategically and systematically analyse global and domestic dynamics, be prepared for long-term uncertainties, and seize new opportunities in crises and transitions.

[88] We must enhance our fighting spirit, adapt flexibly, mobilise all positive forces, and continue to win new victories in this great and historic struggle with many new features.

[89] Comrades and friends,

"As Heaven maintains its vigour through movement, a gentleman should constantly strive for self-improvement."

[90] The greatness of a nation lies in its unyielding resolve in the face of adversity.

[91] Having risen from 5,000 years of hardship and glory, the Chinese people and the Chinese nation will forge ahead bravely on the great journey of the new era.

[92] No force or power can stop the Chinese people from achieving an even better life!

[93] Let us unite even more closely, vigorously promote the great anti-epidemic spirit, press forward with firm resolve, and strive to win the full victory in building a moderately prosperous society and eradicating poverty. [93.1] Let us create new historic achievements in building a modern socialist country in all respects!

Group 2 - Vaccination certification and COVID passes

[G2-CN-Text 3] *Travel: Yellow or Red Health Code Holders Not Allowed to Enter Train Stations*

From: People.cn, sourced from Beijing Youth Daily

Published 6 August 2021

Confrontation

[1] According to a report from Beijing Youth Daily, the China Railway Beijing Group Co., Ltd. has announced that, in accordance with local epidemic prevention policies, as of midnight yesterday, all railway stations in the Beijing area are now conducting 100% health code checks for passengers entering stations. [1.1] Only those with a green code may enter and board trains, while those with yellow or red codes are not permitted access.

Opening

[2] Furthermore, all inbound trains to Beijing, including those passing through Beijing stations, are required to conduct 100% Health Code verification for passengers prior to their arrival in the city.

[2.1] At present, additional personnel have been deployed at station entrances across Beijing to manually verify health codes. [2.2] Announcements are being made via loudspeakers to remind passengers to open their "Beijing Health Kit" app in advance. [2.3] Those with yellow or red codes are prohibited from entering the station or boarding trains.

Argumentation

[3][Claim] In key station areas, designated isolation zones and special access channels have been established in cooperation with the railway authorities at six stations. [3.1][Warrant] These measures aim to manage passengers identified as high-risk and prevent them from mingling with others. [3.2][Backing] Close and secondary contacts are being transferred in a closed-loop system and placed under centralised quarantine. [3.3][Backing] Meanwhile, staff are guiding passengers to disperse in an orderly manner, continuously patrolling the area, reminding passengers to wear masks, avoid crowding, and maintain safe distancing.

Conclusion

[4] In addition, according to information from Beijing Suburban Railway Investment Co., from 24:00 on 4 August onwards, all suburban railway stations in the Beijing area will also implement 100% health code checks. [4.1] All passengers must present a green health code to be allowed entry and to board trains. [4.2] Before entering, passengers are required to proactively show their health code to railway staff.

Group 3 - Explanations of disease surveillance applications

[G3-CN-Text 4] *Health Codes: A Fast Track to Resuming Work and Economic Activity*

From: Xinhua, sourced from Guangming Daily

Published 22 March 2020

Confrontation

[1] At 13:24 and 15:13 on 19 March, the first two free high-speed rail services for returning to work departed from Jingzhou Station in Hubei, transporting a total of 1,631 migrant workers from Jingzhou directly to 898 enterprises in Guangdong Province. [1.1] All passengers had been issued a Hubei health code and had passed nucleic acid tests. [1.2] In the near future, 40,000 Hubei workers are expected to return to Guangdong using the health code system.

Opening

[2] As the resumption of work and production proceeds in an orderly manner, nationwide mutual recognition of health codes is being fast-tracked. [2.1] On 20 March, Mao Qunan, Director of the Department of Planning at the National Health Commission and Deputy

Director of the National Patriotic Health Campaign Committee, stated: "At present, the State Council's e-Government Office and the National Health Commission have provided three pathways for inter-provincial recognition and data sharing. Provinces may choose implementation paths based on local conditions."

[3] How are provinces interconnecting health code data? What issues are emerging in use? Reporters conducted in-depth interviews to find out.

Argumentation

[3] [Subtitle] Focusing on Key Groups: Health Codes Support Returning Workers

[3.1] [Claim] How can individuals from other provinces enter Hubei during the work resumption period? [3.2] [Grounds] On 19 March, Hubei Province issued a notice stating that non-Hubei residents could apply for a Hubei health code via the "E Hubei" app, the national "Internet + Regulation" mini programme, the Alipay mini programme, or the "E Hubei" WeChat mini programme. [3.3] [Qualifier] Holders of a green code may travel within the province freely.

[4] [Grounds] Meanwhile, Hangzhou in Zhejiang Province was the first to "embrace" returning workers from Hubei. [4.1] [Backing] From 18 March, individuals from Hubei holding a valid health code were permitted to return to work in Hangzhou without undergoing quarantine. [4.2] [Warrant] The reason for Hangzhou's rapid response lies in the early adoption of the health code system.

[5] [Grounds] In Yuhang District, Hangzhou, which has a large migrant population and high mobility, the outbreak exposed key challenges in controlling person-to-person contact and eliminating duplicate paper registration. [5.1] [Backing] On 4 February, Yuhang proposed a digital solution to serve as a health credential during the pandemic. [5.2] [Warrant] Teams from Alipay, DingTalk, and Alibaba Cloud collaborated with local authorities to develop the health code. [5.3] [Rebuttal] "During that time, we slept two or three hours a day. There were updates every 30 minutes before launch and every half-day after," said a staff member involved in the Yuhang health code project.

[6] [Claim] On the evening of 7 February, Yuhang released the nation's first health code—the "Yuhang Green Code"—allowing residents to travel and return to work. [6.1] [Backing] On 11 February, the Hangzhou health code was launched on Alipay, pioneering the use of a dynamic red-yellow-green colour scheme.

[7] [Grounds] The wider impact of health codes soon became apparent. [7.1] [Backing] On 16 February, while some regions were still concerned about the return of workers causing a second wave of movement, Zhejiang leveraged health codes to begin resuming work and production. [7.2] [Warrant] That night, the nation's first return-to-work train departed from Guiyang North and arrived at Hangzhou East, carrying nearly 300 migrant workers from Guizhou. On 19 February, West Lake Scenic Area in Hangzhou also reopened.

[8] [Claim] Within just two weeks, the health code system had expanded from Hangzhou to 200 cities nationwide, and the process of interconnection and mutual recognition had begun. [8.1] [Backing] Data show that 25 provinces, municipalities and autonomous regions now allow residents to obtain a health code via Alipay. [8.2] [Qualifier] Additionally, a "national version" of the health code—the Epidemic Prevention Health Information Code—developed under the guidance of the General Office of the State Council, was also launched via Alipay and is now available nationwide.

[9] [Grounds] Notably, Zhejiang introduced an international version of the health code to address the needs of overseas Chinese, students and foreign nationals returning to the province. [9.1] [Backing] Distinct from the domestic version, the international version uses an orange-yellow-green colour classification. [9.2] [Warrant] As of 12:00 on 16 March, Zhejiang had issued 72.092 million health codes, including 31,000 international codes.

[Subtitle] Breaking Bottlenecks: Data Silos Are Being Dismantled

[10] [Grounds] At 7:30 p.m. on 18 March, six coaches carrying 148 returning workers from Hubei arrived at Yunxiang West Road, Baiyun District, Guangzhou. [10.1] [Backing] Medical staff boarded to take temperatures and check health codes. "Guangzhou has long been my home," said returning worker Li Xiande.

[11] [Claim] On 16 March, Baiyun District officially became the first district in Guangzhou to recognise Hubei health codes. [11.1] [Warrant] Returnees from Hubei holding a green code no longer needed to quarantine or undergo testing. [11.2] [Backing] The policy provided strong reassurance to returning workers.

[12] [Grounds] In Sanyuanli Subdistrict, Baiyun District, more than 6,000 Hubei residents rented homes before the Spring Festival, and 4,900 returned to their hometowns during the holiday. [12.1] [Backing] The district's Human Resources and Social Security Bureau said it would continue operating point-to-point return-to-work services, assign staff to assist

returnees with accommodation and factory integration, and ensure seamless workflows for the entire return-to-work process.

[13] [Grounds] In Shandong Province, Song Yuying, a resident of Jiaheyuan Community in Yantai Development Zone, returned to Yantai from her hometown in Suihua, Heilongjiang after the holiday. [13.1] [Warrant] She presented a "Heilongjiang Health Card" issued by her home province and within five minutes at the local community office, her health status was successfully recognised and converted into a "Shandong Health Travel Card."

[14] [Claim] This mutual recognition is helping dismantle long-standing "data silos." [14.1] [Backing] From 19 March onwards, all individuals arriving in Shandong from provinces with established mutual recognition agreements may be freely admitted upon presentation of a valid health code. [14.2] [Qualifier] They are also encouraged to register for the local "Entry into Shandong" health module. [14.3] [Rebuttal] For those from provinces without such agreements or those unable to present a health code, a 14-day quarantine policy remains in place. [14.4] [Backing] Shandong has already established inter-provincial mutual recognition mechanisms with 19 provinces that have high population mobility.

[15] [Grounds] Zhejiang has also achieved mutual recognition with many regions. [15.1] [Backing] As early as 28 February, Hainan and Henan signed mutual recognition agreements with Zhejiang. [15.2] [Warrant] To date, Zhejiang has achieved mutual recognition of health codes with at least 10 provinces and municipalities, including Hubei and Sichuan.

[16] [Claim] Health code usage is also being refined, with some provinces enabling "one-time registration for multi-region use." [16.1] [Backing] For instance, Hubei residents who apply for a health code on Alipay may return to work in Hangzhou without reapplying for a local code. [16.2] [Grounds] On 18 March, a group of migrant workers from Xianfeng County, Enshi Prefecture, Hubei returned to Hangzhou via coach, relying solely on their health code.

[17] [Subtitle] Filling the Gaps: Multi-Channel Recognition and Data Sharing

[17.1] [Grounds] On 21 March, Mao Qunan stated at a State Council Joint Prevention and Control Mechanism press conference: "We have achieved foundational data sharing and mutual recognition. [17.2] [Backing] National databases for confirmed and suspected COVID-19 cases, close contacts, and county-level risk levels have been released via the

National Health Information Platform and the National Integrated Government Service Platform, ensuring uniform standards for mutual recognition."

[17.3] [Claim] He outlined three pathways for cross-provincial mutual recognition of health codes:

• First, without altering local health code systems, enable inter-regional mutual recognition through data sharing.

• Second, link local health codes with the national integrated platform's Epidemic Prevention Health Code, using the national code as a conversion intermediary.

• Third, for areas without their own health code systems, directly adopt the national integrated platform's code.

[18] [Claim] Are there still "weak links" in the implementation of mutual recognition? [18.1] [Grounds] Mao noted that the biggest challenge lies in the differences in local pandemic conditions and policies. [18.2] [Backing] As of now, 98% of counties nationwide are classified as low-risk. [18.3] [Qualifier] Provinces are rapidly aligning their health data with the national platform according to unified data standards.

[19] [Grounds] Zhu Wei, Deputy Director of the Communication Law Research Centre at China University of Political Science and Law, commented: "The structured promotion and optimisation of health code interoperability is a positive move, and the results are commendable."

[20] [Claim] He added that because epidemic control concerns public interest, the introduction of the health code system was both necessary and timely. [20.1] [Warrant] All data subjects were informed and the government is directly involved, ensuring compliance with the Cybersecurity Law and falling within the reasonable use of personal information.

Conclusion

[20.2] However, Zhu also emphasised the importance of safeguarding core personal health data, saying: "As the data collected involves sensitive personal information, China must strengthen privacy protection measures throughout the implementation process."

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[G3-CN-Text 5] *Zhejiang Rolls Out Health Code System Today*

</div>

From: Qianjiang Videos

Confrontation

[1.1] Broadcaster: (…) that requires people to hold a green code for returning to the city. [1.2] The green code is the passport for working, studying, and living in the city. [1.3] People have to show the code when being asked. [1.4] Life of citizens has become easier after the rollout of the Health Code. [1.5] And it is welcomed by the citizens from the beginning.

Opening

[2.1] However, are there any convenient services in the rest part of the province? [2.2] Does our province have a unified plan? [2.3] The officer of the Provincial Big Data Bureau made an announcement on today's press conference.

Argumentation

[3.1] [Claim] Ruzhong Jiang: The Health Code's operation is based on real information. People who are going back to work should apply it online. An individual QR code will be generated after being verified in the background. [3.2] [Ground] This is a digital passport for travelling in the local areas. [3.3] [Backing] It can be used all over the city once you get it.

[4.1] [Claim] Broadcaster: At the press conference, Jiang says the Provincial pandemic control office has launched a provincial-scale promotion of the Health Code system.

[5.1] [Warrant] Ruzhong Jiang: The Provincial Big Data Bureau has researched and revealed the framework of the provincial Health Code information management system, and the principles of information-sharing activities are established. [5.2] [Backing] Supportive policies and regulations will come out soon.

Conclusion

[6.1] The Health Code system has been introduced in Hangzhou and Jinhua, while the rest part of the province will follow up soon.

[G3-CN-Text 6] *One Person One Code, Big Data Helps Precise Pandemic Prevention*

From: Xinhua

Confrontation

[1] From this week onwards, Zhejiang Province has fully rolled out the 'Health Code,' using big data for epidemic monitoring and analysis, implementing precise prevention and control, and providing scientific guidance for the orderly resumption of work.

Opening

[2] In the Nantaihu New Area Science and Technology Innovation Park in Huzhou City, employees are gradually returning to work. [2.1] Before entering the park, besides disinfection and temperature measurement, they must also check a 'Health Code.'

Argumentation

[3] [Claim] Huzhou Deputy Mayor Lemin Xiang says: Transitioning from strict closed management to precision intelligent control, we can use one code to manage key individuals, allow healthy individuals to move freely, and let more employees return to work on time.

[3.1] [Grounds] Citizens declare personal health information on the Alipay platform. [3.2] [Backing] The background big data conducts comprehensive analysis and verification of whether the declarant has visited areas with severe outbreaks during a certain period. It then generates a personalised QR code. [3.3] [Backing] A green code allows passage, while red and yellow codes may require centralised or home isolation.

[3.4] [Grounds] Since yesterday, the Health Code pioneered by Hangzhou has been fully implemented in Zhejiang, with over 15 million people successfully registered.

[3.5] [Warrant] Hangzhou Municipal Bureau of Data Resources Deputy Director Gangfeng Lu says: A crucial feature of the Health Code is dynamic management. It allows us to comprehensively coordinate urban epidemic prevention and control.

Conclusion

[4] Zhejiang Provincial Office of COVID-19 Epidemic Prevention and Control Deputy Director Guangsheng Chen: This is a combination supported by big data. [4.1] It coordinates epidemic prevention and control while ensuring the resumption of work. [4.2] It makes various work arrangements more precise and effective, laying the foundation for winning the overall battle of epidemic prevention and control.

[G3-CN-Text 7] *Shanghai Optimised Code Issuing Rules of 'Suishenma', Issuing Red Codes to Five Types of People, Yellow Codes to Four types of people*

Argumentation

[1] [Claim] Yinfeng Liu: We have noticed that recently citizens are concerned with the rules of 'Suishenma''s code issuing rules. According to the ongoing pandemic situation and preventive requirements, Shanghai is continuing to optimise Suishenma's regulations and policies on relevant people.

[2] [Grounds] Yesterday, the city's pandemic prevention office published a document. It further clarifies the Suishenma management regulation and specific operational requirements. [2.1] [Warrant] There are five types of people who will be issued with red codes.

[3] [Backing] First, are those who have tested positive in the first-round test and massive test. Second, are confirmed cases without symptoms, and 'suspected infections.' Third, are the close contacts. Fourth, are the international arrivals except from Macau. Fifth, are people who came to Shanghai from high-risk regions.

[3.1] [Backing] Four types of people will be issued with yellow codes. First, are the close contacts under health monitoring after the end of isolation. Second, are 'the close contacts' close contacts (sub-close contacts)' Third, are people who come from moderate-risk regions. Fourth, are 'the untested of should-be-tested'.

[3.2] [Qualifier] Red codes will be issued to citizens who participated in 'one-person-one-tube' PCR tests and tested positive. For those who tested positive in 'multi-person-multi-tubes' tests, the red code will be issued. They will be re-tested by 'one-person-one-tube'. If the result is negative, they will get green codes. The red code will remain if the result is unchanged.

Group 4 - Official commentary on surveillance technologies

[G4-CN-Text 8] *Zhejiang Can Both Ensure Business Reopens and Disease Control with the Help of Big Data*

Confrontation

[1] At 10pm on 26 February, a special train for returning workers slowly drives into Hangzhou East Railway Station, bringing nearly 300 workers from Guizhou Province safely to the city. [1.1] Zhenbo Wang is one of the 300 on this train. She has been expecting to return to work for quite a long time, but a health certificate was required for leaving the village. [1.2] By the help of institutional coordination, the local authorities opened a 'green channel' so Wang and her colleagues can return to Hangzhou by using the Health Code.

Opening

[2] Shuilin Cao, CEO of Hangzhou Dongteng.co, comes to pick up the employees at the railway station. [2.1] He greatly praises the policy because the employees holding green codes can return to work immediately that both business reopen and disease control can be ensured.

Argumentation

[3] [Grounds] The 'Health Code' mentioned by Cao is a digital management tool developed and employed by the Hangzhou Government. [3.1] [Claim] It brings convenience for the citizens and returning workers during the period of pandemic control.

[4] [Grounds] The three colours of the codes are generated by big data comparison of three aspects: 1) the transmission risk index across the country, 2) how long and how many times an individual has stayed in risky areas, and 3) the information of close contacts.

[5] [Claim] 'People holding green codes can enter Hangzhou immediately. If someone has a red code, a 14-day isolation is required. And a 7-day isolation is required for people with yellow codes.' [5.1] [Grounds] The manager of Hangzhou Pandemic Control Department says that making returning workers come back to the city safely while protecting the local residents is an urgent issue that needs to be solved. [5.2] [Warrant] 'Hangzhou is a city of great digital prosperity. The Health Code is developed by taking this advantage.'

[6] [Grounds] On 13 February, the Health Code was formally rolled out in Hangzhou. [6.1] [Claim] Cangpeng Mao, a volunteer of 'Wulin Aunties' from Wenhui Street, Xiacheng District, spotted a returning person with a yellow code by using this system. [6.2] [Backing] 'From discovering to isolation, the whole process only took 15 minutes.'

[7] [Grounds] The Health Code's main functions are 'one-code verification, free registration, reducing contact, and capturing changes.' [7.1] [Claim] So far, Wenhui Street has spotted 17

yellow codes and 42 red codes. [7.2] [Warrant] 'The mechanism of "one person, one code" greatly improved the efficiency and accuracy of community disease control,' says Qiongmei Feng, director of Wenhui Street Office. [7.3] [Warrant] Currently, 5 million people are returning to Hangzhou as business reopening continues. [7.4] [Claim] The director of Hangzhou Disease Control Headquarters says, 'This is a big test for the second phase of pandemic control. [7.5] [Claim] The Health Code brings convenience to non-local workers and provides data support to our city management.'

[8] [Claim] A significant outcome of disease control has been seen in Hangzhou as a result of bearing the principle of "one hand on pandemic control, one hand on business reopening." [8.1] [Backing] The number of infections dropped to single digits after 28 January from a peak of 19 cases.

Conclusion

[9] Zhejiang Province will also innovatively use the 'five colour pandemic map' and 'smart management index' to develop a 'one map, one code, one index' mode that can provide the whole country with a 'Zhejiang experience' of scientific statistics for more reopens.

Group 5 - Privacy standards and legal considerations

[G5-CN-Text 9] *Zhejiang Responds to Health Code "Upgrade": Privacy Must Be Protected and Voluntariness Respected*

From: China News Service

Published 9 February 2020

Confrontation

[1] China News Service, Hangzhou, 2 June (Reporter Zhang Yuhuan) — "When iteratively upgrading the Health Code, whether for epidemic-prevention needs or for other expanded applications, it must continue to reflect a people-centred, user-oriented approach. [1.1] It should be refined from the perspective of administrators while also considering matters from the standpoint of the public. [1.2] Above all, it is essential to strike the right balance between social governance and data security. [1.3] This is the very foundation of the Health Code's legitimacy and credibility, and it reflects the core logic consistently upheld by Zhejiang's precision and intelligent control mechanism."

Opening

[2] On 2 June, at a press conference, Chen Guangsheng, Executive Deputy Director of the Zhejiang Provincial Epidemic Prevention and Control Leading Group Office and Deputy Secretary-General of the Zhejiang Provincial Government, stated that the expansion of the Health Code's application also has reasonable boundaries. [2.1] Its preconditions include effectively protecting personal privacy, preventing the leakage and misuse of epidemic-related data, and ensuring that any functional expansion follows the principles of legality and voluntariness.

Argumentation

[3][Grounds] Earlier, the design concept of the "gradient-colour" Health Code—"One Code for Health Insight"—proposed by Hangzhou's health authorities had drawn public attention. [3.1][Claim] How to expand the scenarios for Health Code use in an orderly way, while ensuring the prudent application of big data, has become an important issue in the next stage of maintaining normal social operations.

[4][Claim] Chen Guangsheng noted that, while the tasks of preventing imported cases and domestic resurgence remain considerable, the functions of the Health Code still require further development, and related management mechanisms must continue to be upheld and improved. [4.1][Backing] As epidemic control enters a stage of regular, ongoing management, the Health Code still has significant practical value.

[5][Claim] "Upgrading the Health Code into a broader service code is an idea currently being explored in some regions. In fact, during the epidemic, the Health Code has already expanded to many application scenarios and played an indispensable role in helping different areas resume work, production, and schooling in an orderly manner. [5.1][Qualifier] But it is necessary to recognise that the Health Code's application has reasonable boundaries," said Chen Guangsheng.

[6][Warrant] He proposed that the Health Code's use must adhere to "three preconditions": it must remain closely aligned with epidemic-prevention needs, focusing primarily on the accurate identification and control of risks; it must effectively protect personal privacy and prevent the leakage or misuse of epidemic-related data; and the extension of related service functions must follow the principles of legality and voluntariness.

[7][Grounds] "The Health Code originated as an emergency-management tool and was widely promoted across Zhejiang on the basis of specific epidemic-control scenarios. [7.1] [Warrant] Once it extends beyond the domain of maintaining public safety, it must be comprehensively assessed and approached with caution. [7.2][Qualifier] Of course, the development of any new innovation may go beyond its original purpose," Chen Guangsheng said. [7.3][Backing] He added that where some localities expand the Health Code's use, if such applications are not based on coercion but rather on voluntary public participation, it should be possible to manage key aspects such as service methods and privacy protection appropriately, thereby addressing various concerns.

Conclusion

[8] "In short, the Health Code should 'do what ought to be done' and 'avoid what ought not to be done,' while excelling in what it does choose to undertake," Chen Guangsheng concluded.

[G5-CN-Text 10] *Lawful and Scientific Use of Big Data to Support Epidemic Prevention and Control — Experts Interpret the Notice on Strengthening Personal Information Protection and Using Big Data to Support Joint Prevention and Control*

From: People.cn

Published 9 February 2020

Confrontation

[1] Recently, during the joint efforts of all sectors of society in combating the COVID-19 pandemic, multiple incidents have emerged online in which individuals' personal information—such as names, mobile numbers, and even detailed addresses and ID numbers—have been publicly disclosed under the pretext of locating close contacts of confirmed cases. [1.1] This has caused considerable distress to those whose personal information was exposed.

Opening

[2] In order to protect personal data during joint epidemic prevention and control, and to effectively leverage big data—including personal information—to support these efforts, the Cyberspace Administration of China has issued the *Notice on Effectively Protecting Personal Information and Supporting Joint Prevention and Control through Big Data*. [2.1] On 9

March, Xinhua News Agency interviewed several experts on how to legally and scientifically utilise big data while safeguarding personal privacy.

Argumentation

[2] [Grounds] "Under the Cybersecurity Law and other relevant legislation, information such as names, addresses, ID numbers, and mobile phone numbers that can identify an individual constitutes personal data," explained Hong Yanqing, Deputy Head of the Special App Governance Task Force. [2.1] [Warrant] "Against the current backdrop of epidemic control and public anxiety, confirmed and suspected COVID-19 patients and their close contacts are often regarded as high-risk individuals. [2.2] [Backing] Once their personal data is disclosed, it may lead to harassment or even harm to their physical and mental health or cause discriminatory treatment. [2.3] [Claim] Such data should be treated as sensitive personal information and be afforded a higher degree of protection."

[3] [Claim] Accordingly, the Notice explicitly states that, aside from institutions authorised by the National Health Commission under the Cybersecurity Law of the People's Republic of China, the Law on the Prevention and Treatment of Infectious Diseases, and the Regulations on Public Health Emergency Response, no organisation or individual may collect or use personal information for epidemic prevention or disease control without the subject's consent. [3.1] [Qualifier] Where other laws or administrative regulations provide otherwise, those provisions shall prevail.

[4] [Claim] "Organisations or individuals without explicit legal authorisation, or those not legally involved in government-organised epidemic control, must not collect or use the personal information of confirmed, suspected or close contacts without their consent—let alone circulate such information on WeChat groups or social media," said Hong. [4.1] [Backing] "For information already leaked, local cybersecurity departments and public security organs should act swiftly to stop or block the spread in order to minimise harm and avoid undermining legitimate data collection efforts."

[5] [Grounds] At present, many local disease control agencies and community-level institutions are conducting surveys to collect personal information of those returning home or to work. [5.1] [Claim] He Yanzhe, an expert from the App Governance Task Force, emphasised the importance of balancing epidemic control with personal data protection when collecting and using such information.

[6] [Claim] According to the Notice, personal data collected for epidemic prevention or disease control must not be used for other purposes. [6.1] [Warrant] Without the consent of the individual, no organisation or person may publicly disclose names, ages, ID numbers, phone numbers or home addresses, unless anonymised for the purpose of joint prevention and control.

[7] [Grounds] "During the process of information collection, which includes gathering, aggregating, sharing and disclosing personal data, every step must observe strict privacy protection to prevent data leaks, loss or misuse," said He Yanzhe. [7.1] [Warrant] Data usage must be specific and limited solely to epidemic control. [7.2] [Qualifier] Once the epidemic response concludes, the data should be deleted in accordance with regulations. [8] [Grounds] In regard to the Notice's encouragement that "qualified enterprises, under the guidance of relevant departments, actively utilise big data to analyse and predict the movement of confirmed, suspected and close contacts, thereby supporting joint prevention and control," Hong Yanqing noted that data and information technologies can greatly enhance the timeliness, accuracy and effectiveness of epidemic control and surveillance. [8.1] [Backing] This also helps identify hidden transmission routes and reduce uncertainties.

[9] [Claim] On one hand, aggregate data can identify population density hotspots and patterns of cross-regional movement, which are essential for predicting the course of the epidemic and allocating medical resources. [9.1] [Grounds] On the other hand, retrospective data analysis allows disease control institutions to detect suspected cases and close contacts early through contact tracing, thereby enabling timely isolation and containment.

[10] [Claim] "Epidemic-related big data analytics involve substantial personal information and even tracking specific groups. [10.1] [Qualifier] Not all entities or individuals are qualified or authorised to undertake such tasks," Hong continued. [10.2] [Warrant] "The primary concern must be legality—whether there is clear legal authorisation. [10.3] [Backing] According to existing laws and regulations on personal information protection in China, data collection and usage must be based on the informed consent of the individual."

Conclusion

[11] Therefore, except for institutions explicitly authorised under the *Law on the Prevention and Treatment of Infectious Diseases* and the *Regulations on Public Health Emergency Response*, no organisation or individual may use personal data for epidemic control or population tracking without prior consent from the individual concerned.

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