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Security and state responses to terrorism: A comparative study of France and the United Kingdom

Konstantelli, Anna-Maria

Citation

Konstantelli, A. -M. (2023). *Security and state responses to terrorism: A comparative study of France and the United Kingdom*.

Version: Not Applicable (or Unknown)

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Note: To cite this publication please use the final published version (if applicable).



**Universiteit
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Master Thesis

Security and state responses to terrorism

A comparative study of France and the United Kingdom

Anna-Maria Konstantelli (3485404)

Institute of Political Science, Universiteit Leiden

Thesis Seminar International Organization

Dr. Gjovalin Macaj

Dr. Babak Rezaedaryakenari

January 16, 2023

Abstract

Terrorism has been a highly salient issue in Europe for the past decades and is treated as an immediate threat to the states and citizens. This study focuses on the 2015-2019 terrorism wave and seeks to identify why states with similar characteristics respond differently to a common threat; through a comparative analysis of the cases of France and the United Kingdom. A securitization framework is applied to examine what ultimately leads to the variation of the actions in the two cases. The expectation is that intense securitization leads to a militaristic response, while low securitization levels lead to a criminal justice approach. The empirical analysis lends support to this argument; however, this study finds it possible that other explanatory factors might be interrelated to the proposed mechanism, influencing the result. This thesis, uses a framework of analysis that links the aspects of security and terrorism and endeavors to further contribute to the study of these topics.

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Introduction

In the aftermath of the 9/11 attacks on the United States (US), governments around the world evolved their policies and counter-terrorism measures rapidly, while intelligence and prevention agencies are following ever-increasing processes to identify, assess and share information, that aid in the global war against terror. Following the attacks on European soil in the early 2000s and 2015 onwards, the terrorist threat rose to the top of the European Union's (EU's) political agenda and remains acute to this day (Nacos, 2019).

The literature on terrorism is extensive, with a focus on descriptive case studies, counter-terrorism practices and policy effectiveness evaluations (Foley, 2013). Nevertheless, previous research has showed that despite facing a similar threat, European states have often responded differently (Samaan & Jacobs, 2020). It is not immediately clear why this is the case. For instance, France follows a militaristic counter-terrorism approach, Norway has adopted a reconciliatory model, while Germany and the United Kingdom (UK) opt for a criminal justice response (Fimreite et al., 2013; Foley, 2013; Samaan & Jacobs, 2020). Identifying why two similar neighbor states exposed to the same threat respond differently, appears to be puzzling and thus, the following research question arises:

Why do states respond differently to the terrorist threat?

Investigating the factors shaping state responses is useful to approach the challenges of counter-terrorism dynamics and security choices today; as well as provide some components for reflection concerning policy-making. Scholars have argued that variation in responses can be attributed to mechanisms such as cultural identity, historical background and norms perception. Set in the broader literature on states' counter-terrorism behavior, this research will examine a different explanation to this puzzling outcome. Drawing from the securitization theory of the 'Copenhagen and Paris Schools', this thesis argues that intense

securitization, might be an explanatory factor in a state's choice to follow a militaristic approach, while the adoption of a criminal justice model might stem from low securitization levels. This is a comparative case analysis, employing qualitative methods and more specifically process tracing and content analysis to test the hypothesis. It mainly uses counter-terrorism policies and national strategic actions, to examine the respective state approach, as well as transcripts of speech acts by the heads of state, to identify the securitization process. Answering the research question is relevant in the study of state responses to terrorism, as it focuses on the importance of factors that influence the development of counter-terrorism policies.

In the first section of this thesis, an overview of the literature on the various responses to terrorism, threat perceptions and different explanatory mechanisms, is presented. This is followed by an introduction to the theoretical and conceptual framework of this research, including the main argument and hypothesis. Upon discussing the methodology, case selection and data sources, the study will proceed in the analysis of the cases of France and the UK. Following a historical background of the two countries' experience with terrorism, a detailed empirical analysis will be conducted through a securitization framework. The final section will conclude with a discussion of the findings and some final remarks on future research; as well as the limitations of this project.

Literature Review

Terrorism can be a challenging and controversial concept to grasp due to its complex nature; and the term has received criticism over the years due to its inherent ferocity and violence (Jenkins, 2018). One impediment to developing a common definition of terrorism is that, as a highly politicized phenomenon, it can be labeled differently, depending on context and viewpoints (D'Amato, 2019). For the purposes of this thesis, the definition of the United Nations General Assembly Resolution 49/60 on December 9th 1994, is used: "Terrorism is all

criminal acts committed with the intent to cause death or serious injury, or taking hostages; intended to provoke a state of terror in the general public, or in a group of persons, with the purpose of provoking a state of terror in the general public or government” (The United Nations, 1994).

The different responses to terrorism, are usually classified into three categories by political scientists: A militaristic approach (warfare model) that aims to prevent, deter, and retaliate against terrorists; a regulatory practice (criminal justice model) that reinforces legal and judicial means to address the threat; and a diplomatic approach (reconciliatory model), focused on political reforms and negotiations (Crelinsten & Schmid, 1993; Nacos, 2019; Rees & Aldrich, 2005).

The response of a democratic state is dictated by its perception of the problem (Crelinsten & Schmid, 1993). According to a number of studies, counter-terrorism strategies are frequently determined by the nature of the threat states face (Bureš, 2011; Shapiro & Byman, 2006;). From a realist perspective, the threat’s external nature, leads the US to pursue its terrorists abroad, favoring a militaristic response. In contrast, European countries mostly prioritize law enforcement, deradicalization processes and intelligence tools due to the threat’s endogenous nature (Bureš 2011).

Scholars offer different, albeit limited, explanations of what influences the variation in responses. However, political science theory suggests that the interplay of various factors, rather than a single aspect, shape the outcome (Foley & Abrahms, 2010). Studies have shown that the influence of historical legacies, as evident through domestic norms and institutions in Europe, has left states with their own distinct set of norms concerning security and liberty, which influence responses to contemporary threats (Foley, 2013). Furthermore, the country’s history with the threat and form of terrorism experienced, influences its perception (Meyer,

2009). Another approach highlights that institutional structure and within-state dynamics, affect the development of counter-terrorism policies and subsequently the state's action (Capoccia, 2010; Crenshaw, 2010; Zegard, 2007).

Variation in responses to the same threat across European states constitutes a relatively small proportion of the literature. While the abovementioned contributions address various factors that influence state responses to terrorism, they do not approach the topic from a security dynamics perspective. In the aftermath of the 2015-2016 the terrorist threat was framed through the mechanisms of political rhetoric and public debate (Samaan & Jacobs 2020). The lack of the threat's association with the crises in the Middle East, prompted a regulatory response by some states. The opposing argument highlighted the role of jihadist ideology, with experts and politicians proclaiming a threat that aims to undermine national security and identity, prompting a shift towards a military response that the government viewed as a strong show of force (Samaan & Jacobs, 2020; Todd, 2015).

Theoretical Framework

One of the most prominent theoretical explanations regarding variance in responses to terrorism, stems from path dependence theory, which is based on the assumption that history matters and contends that current outcomes are influenced by history, rather than dependent on current conditions (DiMaggio 1998; Powell, 1991; Puffert, 2008). Institutionalists build on this theory and emphasize how path dependence affects institutions and shape their behavior and change through time (Hall & Taylor, 1996; Pierson, 2000; Thelen 1999). Thus, historical institutionalism is employed into comparative analyses regarding the development and persistence of institutions (Blyth et al., 2016). Accordingly, scholars of neo-institutionalism, argue that different actors, rules and procedures, as well as inter-institutional conventions, derived from legal systems with resilient historical roots, could also explain the disparity in

responses (DiMaggio, 1998). Constructivists on the other hand, highlight norms presence that prompt as justification for specific actions (Carlsnaes, 2013; Katzenstein, 2003). As pointed out by Finnemore and Sikkink (1998), norms can be highly internalized and as a result, might create different behaviors and approaches in a highly debated area, where boundaries and acceptance are not static.

While these are crucial theories which scholars have analyzed through a variety of models, they are limited to certain issue areas, mainly security dynamics and the role of strategic political discourse. In the aftermath of large-scale terrorist attacks or recurring attacks, that pose an immediate threat to national security, the role of security dynamics, emergency politics and political discourse has a great influence on state choices (D'Amato, 2019).

Terrorism has -by definition- always been part of the security agenda, since it attempts to destroy, partially or completely, some elements of the state (Hoffman, 2006). A theory that was born under the social constructivism umbrella is the “Copenhagen School’s” securitization theory, which argues that it is not the objective aspects of an issue that define it as a security issue, but rather the choices of actors with institutional or political power, such as a government leader (Waeber, 1995). Under this perspective, security issues are framed through speech acts, to elevate an issue above politicization. In specific, speech act is defined as the process through which a securitizing actor, demonstrates to citizens that facing the threat is based on how words and promises become action (Buzan et al., 1998). According to Buzan et al., (1998), securitization process through speech acts, is one of the primary causes of the deployment of security and emergency measures and hence, securitization can be introduced as a plausible mechanism to explain the variance in responses to the same threat. In a democracy, the government oftentimes has to justify the suspension of normal politics to the public. Thus, if an issue is intensely securitized within a state, extreme securitizing moves

from government officials, a rhetorical justification for why intervention, for instance, is the only way to eliminate the threat, are evident (Eroukhmanoff, 2018). Criticizing a gap in this approach, scholars of the Paris School have later proposed that historical, political and institutional aspects should also be considered during the study of securitization processes (Balzacq, 2010; Bigo, 2008).

According to these theoretical explanations, it can be interpreted that it is essential to assess current events, political rhetoric, security aspects, as well as historical legacies and institutions, to determine what influences the outcome; rather than focusing solely on one aspect or the other. Taking these considerations into account, this thesis will apply the securitization theory framework and the contribution of its critics, to examine state responses to terrorist threat, how they have been formulated and to what extent they are related to securitization intensity. The empirical analysis will seek to test the following hypothesis:

France securitized the terrorist threat more intensely than the UK; and that led to the adoption of a militaristic approach.

Methodology

Research Design

This research is an explanatory comparative case study, employing qualitative methods and more specifically, a combination of content and discourse analysis. The cases are selected based on being most similar, except with regard to the dependent variable, the effect that this study seeks to examine. Small-N studies advantage, is examining multiple elements within a few cases, providing in-depth information about the cases in question; a method better suited to deal with complex real-world politics (Barakso et al., 2013). Comparative studies offer high internal validity but lack generalizability of outcomes, a limitation regarding external validity. However, the purpose of this thesis is to gain a deeper

understanding of responses formulation, through theoretical frameworks and thus, generalizability is not as crucial.

Case selection

In order to identify why states' responses deviate, the selected cases ought to have similar characteristics but display variation on the outcome of interest. The universe of cases constitutes of Western European countries for the following reasons: First and foremost, they are liberal democracies, similar in aspects of history, culture, socio-political systems and based on the rule of law (D'Amato, 2019; Foley, 2013). Additionally, according to the Freedom House assessment of the level of democratic governance, access to political rights, civil liberties and freedom, they are equivalent democracies¹. Finally, they share similarities in terms of terrorist threat levels, military capabilities, security and intelligence services and mostly adhere to similar legislation, making them suitable cases for a controlled comparison. The case selection is based on data provided by Europol's annual EU Terrorism Situation and Trend Reports, as well as quantitative and qualitative data that Eurojust, Statista and the EU Member States provide.

The time frame of this thesis is set from 2015 to 2019. As shown in Figures 1 and 2, the latest wave of terrorism posed a severe threat to Europe and resulted into multiple casualties². The selected time period is exceptional, since the frequency of attacks, as well as the closely related phenomenon of escalated jihadist terrorist activities, caused a comparable security crisis; and these carefully planned attacks, prompted a drastic shift in policy responses and readjustments (Europol, 2016; 2020). A formative moment regarding counter-terrorism policies, emerged. States adopted a range of security and intelligence measures while anti-

¹All Western European states score 7 or higher out of 10. For detailed information see <https://spcommreports.ohchr.org/TMResultsBase/DownloadFile?gId=34079> pp. 50-51

² For detailed information on statistics and trends see Europol's TE-SAT reports from 2016-2020, which provide an overview of the terrorism phenomenon in the EU in the previous year of the publication <https://www.europol.europa.eu/publications-events/main-reports/tesat-report>

terrorism efforts were strengthened and arrests and prosecutions of individuals involved in terrorist activities, increased. In light of the above, it is of particular interest to examine how the different responses were shaped under the most recent threat.

Figure 1

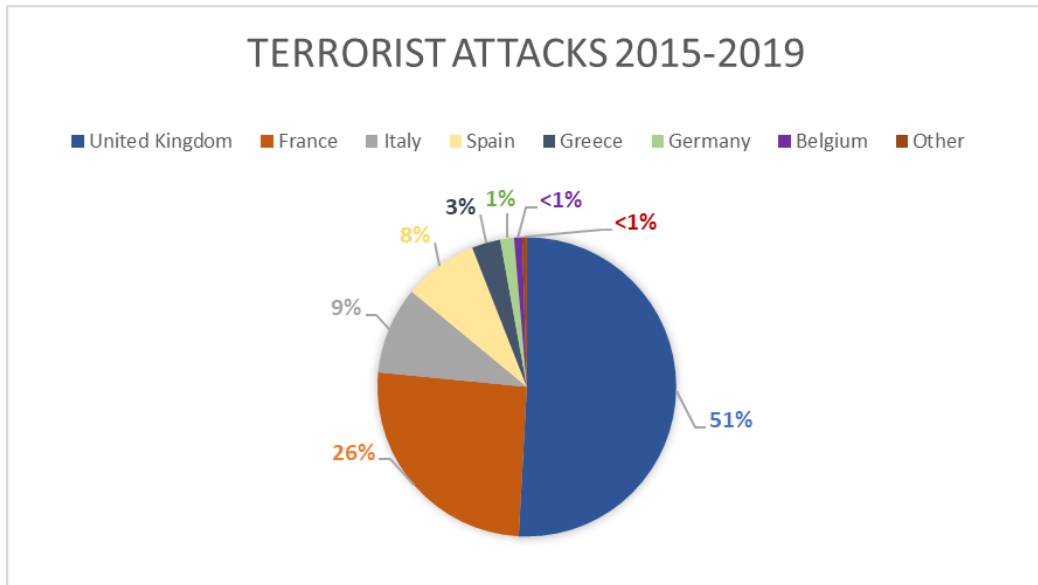


Figure 1 Terrorist attacks 2015-2019 in the EU

Figure 2

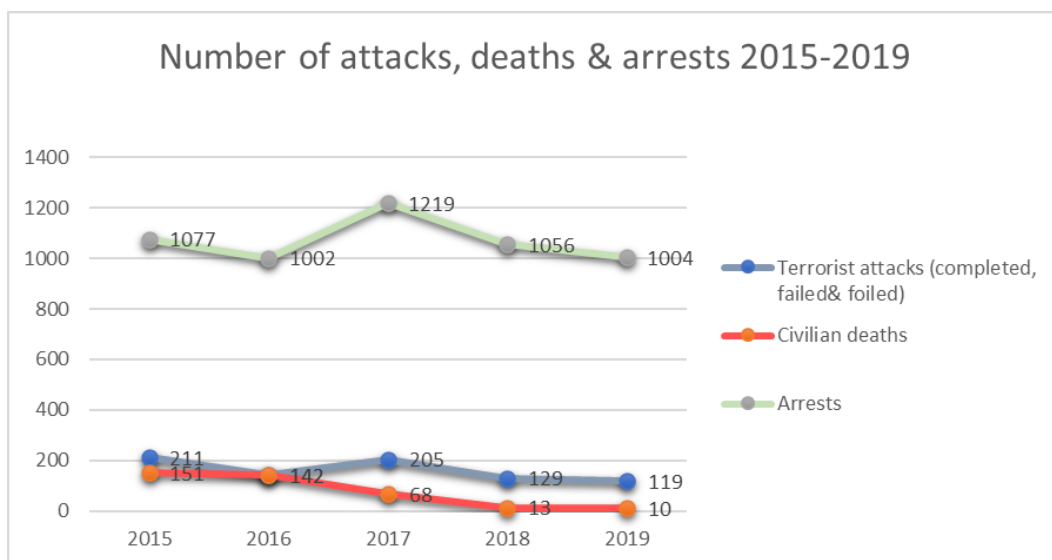


Figure 2 Number of attacks, civilian deaths and arrested suspects from 2015 to 2019 in the EU

Two neighboring states display distinct variation in their responses to the terrorist threat. In specific, France follows a preemptive approach and has adopted a warfare model.

In the aftermath of the 2015 attacks, the state prioritized a forceful response, while at the same time entered into an ‘emergency state’. On the other side, the UK opted for a criminal justice model, while never adopted emergency measures (Ray, 2019). Furthermore, the speech acts of the heads of the state, present noticeable differences in the way the threat was perceived. President Hollande framed the attack as an act of war towards the French state and its people, while Prime Minister May identified it as an act of violence toward democracies in general (Hollande, 2015b; May, 2017a).

France and the UK are the selected cases due to their similarities on other possible explanatory variables. According to the Freedom House Index report (2022), both countries were defined as fully democratic in 2017³. France had an overall score of 90 out of 100, while the United Kingdom scored 95 out of 100. Furthermore, the two states had similar levels of vulnerability and a Global Terrorism Index score of 6.3 and 6 out of 10 in 2017, respectively (Institute of Economics and Peace, 2018⁴). In the time frame of the thesis, both were members of the European Union, NATO, Schengen area and the United Nations and consequently obliged to implement a number of similar regulations regarding counter-terrorism. In addition, both have an extensive history of combating terrorism on their soil and were the two nations with the highest rate of attacks, fatalities, and arrests within their borders, during the reporting period (Europol, 2016; 2017; 2018).

Identifying not only the similarities but also the differences between the two cases will improve the validity of the most-similar research design. One of the most significant differences is the political system, as one country is a presidential democracy and the other a parliamentary one (Cole, 2013). In France, a directly elected President works alongside a Prime Minister and Cabinet, who are accountable to Parliament. In the UK, the Prime

³ For detailed information see <https://spcommreports.ohchr.org/TMResultsBase/DownloadFile?gId=34079>

⁴ The GTI provides a ranking of 163 countries on the impact of terrorism on a 0-10 scale, where 0 represents no impact and 10 represents the highest impact

Minister and Cabinet, who are also accountable to Parliament, lead the government.

Nonetheless, there has been no institutional difference in the ability of British and French executives to formulate and execute counter-terrorism policies (Elgie, 2003; Judge, 2005). In both cases, the executive typically relies on its majority in Parliament to provide a permissive environment for passing legislation, due to strong loyalty to political parties. As a result, no significant differences in the institutional rules and practices of the two parliaments account for the formulation of terrorism responses or influence counter-terrorism policies (Cole, 2013; Foley, 2013).

Before proceeding with the data collection, potential limitations are mentioned. The scope of this research could have expanded upon including other countries that faced terrorism at the same time, such as Belgium or Germany. However, France and the UK were the only European states to experience multiple large-scale attacks in a short period of time, that led to a plethora of policy formulations and measures, providing an interesting comparative angle regarding their response choices. Therefore, it is important to acknowledge that the case selection might be biased.

Data collection & analysis

For the analysis of the cases, different types of data based on both primary and secondary sources, are used. Firstly, an analytical overview of the history, sources and consequences of terrorism in France and the UK, are presented, through relevant literature. In order to detect and measure the effect of securitization intensity on the response to the terrorist wave, national policies, measures and actions, collected through government websites and institutions, as well as transcripts of speech acts by the heads of state, gathered from the database of the respective governments, are then examined. The research tool to analyze the abovementioned data, is a combination of discourse and content analysis. The advantage of a

combination method is twofold. Content analysis supports the empirical study, since it is expected that each country's measures will be relevant to the formulation of their responses. Discourse analysis is a combination of speech acts and practices, as included in the sociological approach of securitization theory. As discourse analysis is primarily linked to the proposed manifestations of securitization through speech acts, the textual analysis of these acts will help to better define the discourse and unfold the securitization process.

Operationalization

The dependent variable, "Variation in responses to terrorism" is coded as (a) Militaristic approach and (b) Criminal justice practice. As Table 1 indicates, the two concepts are defined and specific indicators are set to examine the state responses in the analysis of the case studies.

Table 1

Concept & Definition	Indicators
<p>a) <u>Militaristic approach</u></p> <p>Aims to prevent, deter and retaliate against the terrorist threat, by employing military tactics and including maximal force. The goal is to effectively eradicate terrorists and subvert their political goals (Crelinsten & Schmid, 1993; Crelinsten, 2009; Nacos, 2019; Rees & Aldrich, 2005)</p>	<ol style="list-style-type: none"> 1. Escalation of military interventions/missions abroad 2. Warfare model 3. Declaring a state of emergency 4. High mobilization & increased funding of army/police 5. Increased surveillance, individual's monitoring and arrests without evidence
<p>b) <u>Criminal justice practice</u></p> <p>Reinforces legal and judicial means to address the threat. It requires a system of substantive offences, investigative powers and techniques and international cooperation (Rees & Aldrich, 2005). The goal is to incorporate substantive and procedural mechanisms, as criminal punishment can be a deterrent for future terrorism; and to do so within the constraints of the criminal justice system and rule of law (Crelinsten & Schmid, 1993; Crelinsten, 2009; Nacos, 2019; Samaan & Jacobs, 2020)</p>	<ol style="list-style-type: none"> 1. Reinforcement of legal and judicial means 2. Intelligence services and domestic security strengthening 3. Deradicalization processes 4. Framing terrorist violence as a crime in political discourse 5. Absence of 'state of emergency' that challenges the balance between security and liberty

Table 1 Operationalization of the dependent variable

Before proceeding with the operationalization of the independent variable, it is essential to first define the concepts within the theoretical framework of securitization to be applied; as demonstrated in Table 2.

Table 2

Concept	Operationalization
<i>Securitization</i>	When a securitizing actor uses a rhetoric of existential threat and thereby takes an issue out of what under those conditions is normal politics
<i>Securitization move through speech act</i>	Speech acts are used to elevate an issue above politicization. A securitizing actor, justifies the suspension of normal politics to the public
<i>The identified threat</i>	The entity that is threatening the referent object and needs to be confronted
<i>The referent object</i>	The entity that is being threatened and has to be protected
<i>Securitizing actor</i>	The agent who presents an issue as a threat through a securitizing move. For it to be successful, the actor ought to have the legitimacy to do so and use security language
<i>Audience</i>	The group of people the speech act is aimed to. An issue becomes securitized when the public collectively agrees on the nature of the threat and supports taking extraordinary measures. If the audience rejects it, the act has failed
<i>Extraordinary measures</i>	Exceptional and emergency measures that go beyond normal political procedures
(Balzacq et al., 2016; Buzan et al., 1998; Buzan & Wæver, 2003)	

Table 2 Conceptualization & operationalization of securitization

The operationalization of the independent variable “Securitization levels”, draws from a methodology applied by Baele and Sterck (2014), based on the idea that an issue may go through different levels of securitization, given that the authors understand this process as “the result of practices and framing narratives whose securitizing intensity may be more or less strong”. Due to the complexity of the process and lack of consensus amongst scholars, operationalizing and measuring securitization is far from easy (Baele & Sterck, 2014; Balzacq et al., 2016). This problem was encountered in this thesis as well, as there is no

typology established that clearly measures securitization process or levels, apart from the general indicators of securitization theory set by Buzan et al., (1998). Therefore, as demonstrated in Table 3, the indicators set to assess the securitization intensity of the terrorist threat, are developed upon engaging with relevant literature of other topics and then adapted to the objective of this research.

Table 3

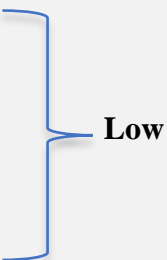

Indicators that show the intensity of securitization	
1. Absence of securitization move in the aftermath of a terrorist attack	 <p>Low</p>
2. Use of specific security language/rhetoric that indicates the threat perception in political discourse	
3. Elevation of national security level	
4. Policy (re)-formulations	
5. Claims of a securitizing actor that the state is currently under severe and existential threat	 <p>High</p>
6. Convincing the audience that in order to counter the threat, exceptional actions are needed and accepted	
7. Adoption of extraordinary and repressive measures	
8. Declaration of emergency state	
(Baele & Sterck, 2014; Balzacq et al., 2016; Buzan et al., 1998; Bourbeau, 2011; Jackson, 2006)	

Table 3 Operationalization of the independent variable

Analysis

In this section, the empirical analysis is carried out. The two cases will be studied separately, starting with France and then moving to the UK, beginning with a historical recollection of their experiences with different forms of terrorist violence, its consequences and the impact these experiences had on the formation of counter-terrorism responses. Subsequently the various actions and policies, along with the respective speech acts, will be examined. Drawing on the data collected within the securitization framework and the

indicators set, it will be assessed whether securitization intensity has affected the formulation of the states' responses to terrorism.

France

An overview of terrorism in France

This section details the key moments in France's contemporary history of terrorist violence and the impact of these experiences in the counter-terrorism system. Figure 3 displays the casualties and the frequency of terrorist attacks perpetrated against France from 1980 to 2020⁵.

Figure 3

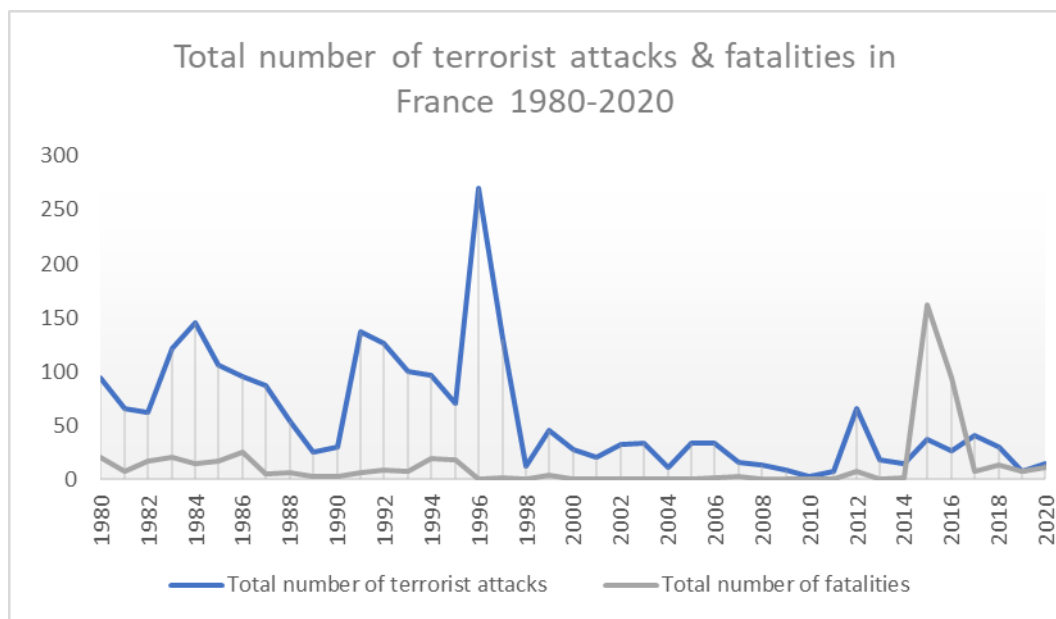


Figure 3 Attacks & fatalities in France 1980-2020

France has been confronted with terrorism on its soil since the 1980s. During that time, the country was threatened by left-wing ideologically devoted groups, like *Action Directe*, committed to the overthrow of the capitalist system and the demise of American imperialism (Block, 2005). Another form of terrorism, stemmed from regional separatist groups, such as

⁵ For detailed information see <https://www.statista.com/statistics/541152/incidences-of-terrorism-france/> and <https://ourworldindata.org/terrorism>

the *Front de libération nationale corse*, that demanded independence for specific regions of France, mainly Corsica but also the Basque Country and Brittany (Shapiro & Suzan, 2003). Although protracted, the national conflict for Corsican independence by this ‘pseudo-separatist’ movement, was smaller in terms of destruction and casualties than other European extremist organizations (Sánchez, 2008).

The French authorities effectively faced left-wing and separatist terrorism, but had little experience with international terrorism. In the early 1980s, the French policies in the Middle East began to conflict these of Syria, Iran and Libya, the region’s primary sponsors of terrorism; and provoked multiple fatal attacks in Paris in 1986 (Shapiro & Suzan, 2003). As a consequence of diplomatic negotiations, the government withdrew from Lebanese affairs, settled the debts with the Iranian government and significantly reduced its support for Iraq during the Iran-Iraq war. It is thus apparent that when confronted with international terrorism, France pursued a diplomatic approach influenced by the will of the terrorists (Wieviorka, 1991).

The states inability to prevent the 1980s-1990s attacks, led to the adoption of a plethora of security and legislative measures such as border controls, arrests, police strengthening and creation of specialized counter-terrorism units within the interior and justice ministries (Shapiro & Suzan, 2003). The purpose of these units was to interconnect intelligence and police services. That was essential for France because, prior to the implementation of the anti-terrorist policy in September 1986, there was no single organization responsible for terrorism (Chauvin, 1990).

The abovementioned legislation was put into test during the extension of the Algerian civil crisis to France, when an Air France flight was hijacked by the Armed Islamic Group of Algeria on 1994 (Shapiro & Suzan, 2003). Multiple attacks took place in the following years,

elevating the new threat, which proved to be a highly alarming, complex and global phenomenon. In 1994, the *Direction de la Surveillance du Territoire* was created in order to serve as the main domestic agency for mitigating threats to the state's internal security that originated in or were inspired from abroad. It worked closely with the police in conducting domestic surveillance and formulating vulnerability terrorism assessments (Chalk, 2020). Moreover, the subsequent 1996 legislation, introduced policies that emphasized sanctuary, accommodation and ultimately suppression and prevention. However, it often drew criticism regarding violations of civil rights, the extensive use of forceful police operations against suspects that was gradually consolidated and the marginalization of the French Arab community (Bigo, 2008).

In the immediate aftermath of the 9/11 attacks and the subsequent global "war on terror", France showed solidarity with the US and adopted a multitude of counter-terrorism measures, as well as supported international cooperation in the face of a common threat. The anti-terrorism laws that were adopted from 2001 to 2010, authorized permanent permissions to the police to access apartments at any time given suspicion for terrorist acts, envisaged detention without charges, enhanced surveillance and monitoring of individuals, travel restrictions and personal data collection and analysis (D'Amato, 2019; Foley, 2013). The French perception and response to international terrorism was renewed with the Defense and National Security Act of 2008, which was the result of the strong insistence of President Sarkozy. The launch of the national security reform, as well as a series of important institutional changes, marked a defining moment in the reformation of the state's security apparatus (D'Amato, 2019).

Following two relatively peaceful decades, France experienced a series of fatal attacks in 2015-2016 that were among Europe's most alarming and led the country to impose draconian measures. Although controversial, the new anti-terrorism law of 2017, introduced a broad selection of measures formally ending the two-year long state of emergency; but normalizing

emergency politics and permitting distinctively repressive measures to be undertaken by security agencies (Boutin & Paulussen, 2016).

Today, France's counter-terrorism structure is fairly complex, as it does not have a single governmental body in charge of combating terrorism. On the contrary, it consists of one dedicated domestic security service, two police-based intelligence units and two coordinating bodies (Chalk, 2020). The current structure is centered on the judicial authorities of the Paris High Court, the Ministry of the Interior, and the Ministry of Defense. Despite the system of coordination agreements between agencies, the added administrative bureaucracy complicates matters and leads to deficiencies (D'Amato, 2019). The government has taken comprehensive action to address the terrorist threat, in the wake of the 2015 attacks, such as the state of emergency, military operations *Santinelle* and *Chammal*, the *Loi Renseignement* law and the 2017-1510 anti-terrorism law. France's commitment to controversial and repressive legislation, as well as the escalation of military interventions, highlights the state's commitment in prioritizing a militaristic approach to combat terrorism (Ibid, 2019).

The French response to the most recent terrorist threat

Following a twenty year-period without large-scale coordinated terrorist attacks, France experienced a series of unprecedented incidents in 2015 and 2016. On January 7th 2015, a terrorist attack on the office of the satirical magazine Charlie Hebdo, resulted in the death of 12 people. On the following days, several related attacks occurred, including a Jewish supermarket siege, in which 4 people were killed. Eleven months later, on November 13, 2015, Europe experienced one of its darkest days as series of coordinated terrorist attacks, involving mass shootings and suicide bombings, occurred around Paris. The deadliest attack took place at the Bataclan theater, leaving behind 130 civilian deaths and more than 400 injured (Ray, 2019). Eight months later, on July 14th 2016, a cargo truck was deliberately driven into a crowd of people celebrating Bastille Day in Nice, killing 86 people and injuring

more than 400. These incidents shook France to the core and overnight, security and terrorism became the most important concerns for the French public. In the following years, related smaller-scale terrorist attacks occurred, but the majority were foiled in time by the authorities (Mayer et al., 2016).

The analysis of the various measures and speech acts indicate that France responded forcefully to this terrorist wave, by employing a militaristic model. In the aftermath of the Charlie Hebdo incident, that President Hollande framed as an “act of exceptional barbarism that strikes at the heart of republican values through one of its pillars, independent press”, France intensified security measures and surveillance, as well as police patrolling; indicating the country’s intense degree of securitization (Hollande, 2015a). In specific, Operation *Santinelle* was launched, highlighting the raised security concerns. More than 10.000 soldiers were deployed throughout Paris, at the Eiffel Tower, media and news outlets, places of worship and the public transportation system; and additional 5.000 police officers were sent to assure the protection of the Jewish communities (Ray, 2019). Accordingly, France’s military intervention in the Syrian Civil War was dramatically amplified, in order to retaliate against terrorists. French warplanes launched a series of strikes in Al-Raqqah, Syria and the number of deployed troops in the Middle East, Northern Africa and the Sahel region, highly increased in the wake of the Paris attacks (Ibid, 2019). Both Operation *Santinelle* and the military interventions in Syria and Iraq were once again intensified following the Nice attack in 2016, with President Hollande stating that “we will continue to hit those who attack us on our own soil and enable all the necessary personnel to be deployed on every site where we need protection and vigilance” (Hollande, 2016). In line with the militaristic approach, domestic security spending was also increased by 850 million in 2015, to fund counter-terrorism efforts and strengthen the army and police forces; a defense budget that reached 3.8 billion over the following four years (Ray, 2019).

France showed an assertive military role in the belief that interventions abroad deter future attacks at home (Samaan & Jacobs, 2020). Air-force interventions through Operation *Chammal*, in Iraq and Syrian territories were further reinforced, the European Convention on Human Rights was derogated and as a result, security agencies were allowed to take extreme and controversial measures over the years in terms of surveillance, searches and arrests without concrete evidence (D'Amato, 2019; Ray, 2019; Todd, 2015). The adoption of emergency and repressive measures is the greatest indicator of the country's intense levels of securitization. Moreover, upon great anti-terrorism efforts by French Prime Minister Manuel Valls, the government enacted in July 2015, the "*Loi Renseignement*", a controversial intelligence law, that lies under the adoption of exceptional measures that go beyond normal political procedures, in situations of intensified security (D'Amato, 2019). It allows intelligence agencies to log internet communications and activities, as well as text messages and phone calls, without judicial warrants (Conseil Constitutionnel, 2015).

By analyzing President François Hollande's speech act held before a joint session of the Parliament after the Paris attacks, a clear securitization move aimed to justify the adoption of exceptional measures, is evident. In specific, by the phrases "France is at war", "the target was France as a whole" and "we will be involved in the fight against Daesh for a long time", the securitizing actor, is highlighting that the state is currently under severe threat (Hollande, 2015b). This is also enhanced by the elevation of the national security threat level to 'critical', as well as by the declaration of an emergency state. Moreover, the head of the state is aiming at convincing the audience that in order to counter the threat, exceptional actions, such as military interventions, intense surveillance and the emergency state, are required and accepted. This is repeatedly stated and justified by phrases such as "the state is at war", "in order to guarantee the safety of the citizens" and "it is urgent to defend ourselves". Finally, President Hollande uses specific security language/rhetoric, that indicates the framing of the

threat as “a direct war act against France” and that the response will be “merciless” (Ibid, 2015b).

The high intensity of securitization is also evident by the state of emergency itself, as it was prolonged five times after the initial twelve-days period and ended up lasting two full years, despite its design for short periods of crisis. This legal provision granted the Ministry of Interior supreme authority in a variety of areas and led to controversy among the public debate as it did not prevent future terrorist acts including the Nice attack of July 2016 (Samaan & Jacobs, 2020). It was officially ended by the new President, Emmanuel Macron on November 1st, 2017 by introducing the 2017-1510 broad counter-terrorism legislation. The normalization of emergency politics through this new legislation, led to the country being accused of permitting distinctively repressive measures to be undertaken by security agencies and therefore not fully adhering to its democratic norms (Boutin & Paulussen, 2016). Additionally, the increased army and police patrolling, as well as the ability to conduct searches without warrants or concrete evidence, confirms that a forceful response was prioritized, over upholding democratic values.

France also called on the European Union for reformulation of policies; demonstrating that the current threat affects the international community as well. In light of the Charlie Hebdo attack, the Ministers of Justice and Home Affairs, presented policy proposals during a meeting on January 11th, 2015. These proposals, namely, increased Schengen border controls and information gathering and sharing between states, underline the focus of the EU response on cooperation and prevention of future attacks. Member states were advised to establish counter-narrative and strategic communication policies, in order to tackle the underlying factors that lead to radicalization (Council of the European Union, 2015). Moreover, the Charlie Hebdo attack reignited policy discussions about the Passenger Name Record (PNR) Directive, which the European Parliament rejected to vote in 2008; due to concerns about

privacy and data protection. It was only after the Paris attacks, when on April 2016, the PNR directive went into full effect, requiring airlines to report flight data from the EU to the authorities of the member states. It also permits states to collect data from flights within the EU; and despite the directive's optional framework, all members approved it (European Council, 2016).

The analysis of the French response to the latest terrorist wave, lend support to the prime hypothesis and it can be interpreted that France chose to adopt a militaristic approach and this thesis finds it plausible that intense securitization could be a major explanatory factor for it. The immediate consequence of the 2015-2016 attacks was the reframing of the public and political debate into an existential discussion, in which the French identity itself was the target (Todd, 2015). From this perspective, the contentious issues of France's domestic problems were removed from the discussion and the political initiatives tied the attacks closely to border management and the immigration crisis. The French public logically demanded a change of previous policies and this prompted a shift toward a military-oriented response, which the government perceived as a strong show of force (Samaan & Jacobs, 2020).

The United Kingdom

An overview of terrorism in the United Kingdom

This section details the key moments in UK's contemporary history of terrorism. Figure 4 displays the casualties and the frequency of terrorist attacks perpetrated against the UK from 1980 to 2020⁶.

Figure 4

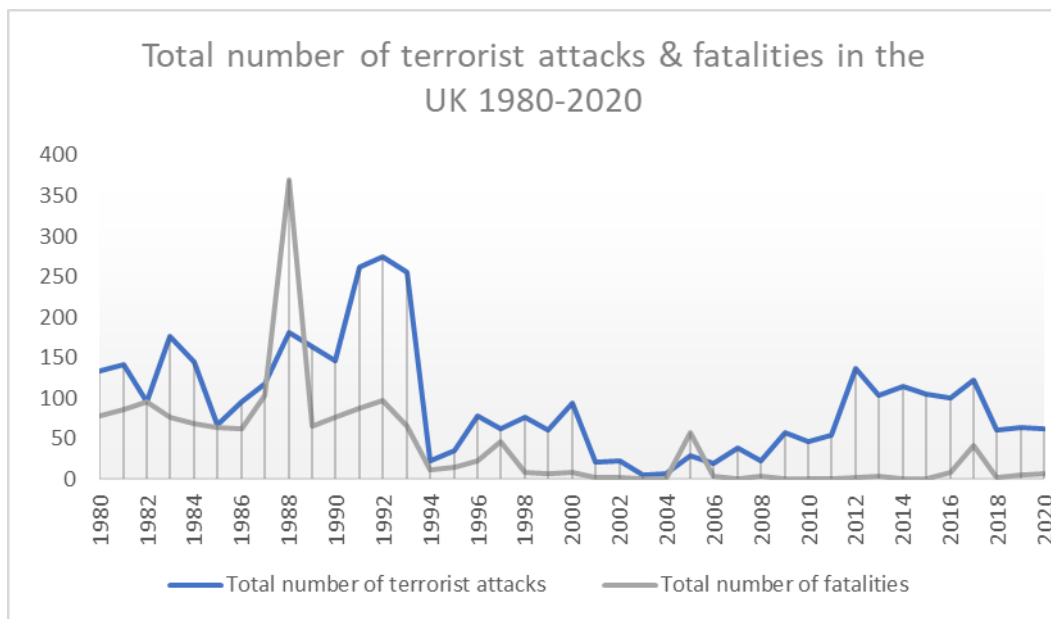


Figure 4 Attacks & fatalities in the UK 1980-2020

The United Kingdom has a long and sustained history of terrorist incidents on its soil, the most prominent of which were the Northern Ireland conflicts from 1969 until the late 1990s. “The Troubles” with the Irish Republican Army (IRA), involved more attacks and a greater number of fatalities than in the same period in France. For more than two decades, the British response was primarily coercive, relying on military, police, and intelligence services by authorizing repressive measures, arrests and prosecutions without fair trials and increased

⁶ For detailed information see <https://www.statista.com/statistics/539190/incidences-of-terrorism-united-kingdom/> and <https://ourworldindata.org/terrorism>

surveillance (Walker, 2009). Significant terrorist incidents such as the Birmingham pub bombings in 1974 and the Lockerbie air bombing in 1988, not only sparked a new legislative regime of anti-terrorism laws, such as the Prevention of Terrorism Act of 1989, but also forced significant amendments in the criminal justice system (Walker & Starmer, 1999). Following the Omagh Bombing of 15 August 1998, the British Government introduced a complex political agreement aiming at improving relations between Britain and Northern Ireland, by withdrawing most of its military forces and modifying the police service, as well as meeting many of the IRA's social and human rights demands. The agreement, however, made no changes to Northern Ireland's constitutional status within the United Kingdom (Foley, 2013). In retrospect, intelligence and targeted law enforcement operations, proved to be more effective tools against Irish republicans than other more repressive techniques; and in the long run, a more subdued response ended up influencing the counter-terrorism culture in the UK (Walker, 2009; Foley, 2013).

The 9/11 attacks in the United States, along with the British participation in US-led campaigns in Afghanistan and Iraq, introduced a new era where the threat from international networks, such as Al-Qaeda, became the principal priority in the UK's national security agenda (Bamford, 2004). The new Terrorism Act 2000, replaced previous Acts and was the first of a number of anti-terrorism legislations introduced by the Parliament of the UK. Through a criminalization strategy, it established specific offences, courts and criminal procedures, as well as control-management, to better prevent and deter terrorist activities through police intervention and surveillance. Additionally, it highlighted the importance of intelligence, as reflected in institutional terms, with the growth in expenditure on the intelligence community and the establishment, of bodies such as the Joint Terrorism Analysis Centre within the Security Service, MI5 (Walker, 2009).

The July 2005 London bombings, carried out by radicalized individuals with an unclear affiliation with the Al-Qaeda network⁷ and a series of failed attacks that followed, highlighted this unparalleled international terrorist threat (Bamford, 2004). In the aftermath of the London Bombings, the UK enacted several legislative changes that grant security agencies supreme authority, including the Terrorism Act 2006 and the Terrorism Prevention and Investigation Measures Act, which was passed in 2012 (Lister, 2015). This new wave of reactive legislation and activity stemmed from Prime Minister Blair's strong insistence on criminalizing the ideas that encouraged and motivated terrorists. Another response to the London bombings was the 2006 revision of the Countering International Terrorism (CONTEST) strategy, which focuses on preventing extremism, pursuing terrorists, and preparing for future terrorist attacks (Walker, 2009).

Following a decade of counting many foiled and failed terrorist attacks, the fatal incidents of 2017 carried out by radicalized jihadi perpetrators claimed the lives of over 30 civilians and created a security crisis in the country, emphasizing the severity of the threat. The United Kingdom followed a more restraint approach than France, with Prime Minister May framing the attacks as an act of violence against democratic values intended to instill fear in the public. The lessons learned from the 2017 attacks were reflected in the updated CONTEST strategy that was released on June 2018 and increased the legislative powers and capacities available to law enforcement and intelligence services to effectively combat terrorism and prevent future incidents (GOV.UK, 2017).

The United Kingdom has enacted an expansive criminal justice regime that includes a number of police and intelligence agencies responsible for combating terrorism. However,

⁷ For detailed information on the attacks and the connection with Al-Qaeda see: Home Office, Report of the Official Account of the Bombings in London on 7th July 2005, HC 1087 (London: TSO, 11 May 2006) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228837/1087.

the primary domestic responsibility falls primarily on Security Service MI5 and its director-general, who reports to the home secretary. The Office for Security and Counter-Terrorism coordinates the government's response in case of a terrorist incident (GOV.UK, 2022). MI5, a strictly intelligence service, closely cooperates with other national and international agencies, as well as with local police forces, but has no arrest powers (Security Service, 2019). Its legal mandate is to gather information by employing a variety of intrusive intelligence gathering techniques against threats to the UK's national security (Chalk, 2020). Additionally, the Secret Intelligence Services, better known as MI6, is responsible for obtaining and providing information relating to terrorist activity and individuals abroad (Secret Intelligence Service, 2018). Foley (2013) describes the national security agencies as having more 'formal routines' than France's. Furthermore, the state has taken comprehensive action to address the terrorist threat by enacting extensive legislation, such as the Terrorism Acts of 2000, 2006, and 2008, as well as the CONTEST strategy, focusing on systemic coordination across intelligence and security services and actively supporting international cooperation and information exchange. The UK's commitment to fighting the battle against terrorism through legislation and judicial counter-terrorism policies underlines the commitment of the UK's approach to criminal justice processes, within legal boundaries (Nacos, 2019; Tsoukala, 2006; Walker, 2009).

The British response to the most recent terrorist threat

In 2017, the United Kingdom experienced a series of terrorist attacks in a three-month period that shook the public and prompted a formative moment within the state regarding counter-terrorism policies. The first attack took place on March 22nd 2017, outside of the Palace of Westminster in London, seat of the British Parliament. A vehicle was driven to pedestrians who were crossing Westminster Bridge, injuring more than 50 and killing 5. Two months later, a perpetrator committed a suicide explosion, as attendees were leaving a concert

venue in Manchester arena, on May 22nd 2017. The explosion killed 23 people and injured more than 50, including many children. Ten days later, on June 3rd 2017, a vehicle was deliberately driven into pedestrians on London Bridge, before crashing on the south side of River Thames. Immediately afterwards, the three perpetrators went on foot towards the nearby area, where multiple stabbings took place, resulting in the death of 8 civilians and police officers. Over the following years, related smaller-scale terrorist incidents occurred in the country, but most of the terrorist plots were successfully foiled by the authorities (Europol, 2020).

The analysis of the various measures and speech acts demonstrates that the UK responded to the latest terrorist wave with a regulatory approach, by employing a criminal justice model. To begin with, Prime Minister May's political discourse, reveals a fundamental difference with the case of France, where the representation of the problem was interpreted as an act of war against the state and its people. In the British case, the terrorist violence was treated as a "Criminal action that attack free people everywhere", and hence the threat was framed as an attack on democracy and Western values in general, which the UK also represents (May, 2017a). Additionally, in the aftermath of the London Bridge attack, the Prime Minister announced that "We need to review Britain's counter-terrorism strategy to make sure the police and security services have all the powers they need; and if we need to increase the length of custodial sentences for terrorism-related offences, even for less serious offences, that is what we will do" (May, 2017c). Consequently, more than 400 arrests for terrorism related offenses were reported in the subsequent months, a fairly high figure when compared to previous years (Office for Security and Counter-Terrorism, 2018).

In response to the terrorist violence, a formative political momentum regarding counter-terrorism, emerged. The revised CONTEST strategy, that was released on June 4th 2018, reflects the lessons learned from the 2017 attacks. In line with the criminal justice model, its

purpose is to increase the legislative powers and capacities available to law enforcement and intelligence services to combat terrorism, as well as to guarantee that sentences for terrorism offenses accurately reflect the seriousness of the crimes committed (GOV.UK, 2017).

According to the Home Office (2018), the strategy is based on four pillars:

- Prevent: to stop people from becoming terrorists or from supporting terrorism
- Pursue: to stop and prevent terrorist attacks
- Protect: to strengthen protection against a terrorist attack
- Prepare: to mitigate the impact of a terrorist attack

CONTEST focuses on deradicalization processes, by strengthening the resilience of local communities to terrorism as well as through reinforcing intelligence services and internal security. This includes empowering the Security Service MI5 and Counter Terrorism Policing to share more information with a wider range of partners, including government agencies, devolved administrations and local authorities (Ibid, 2018).

In contrast to France, security measures such as police patrolling, were only increased as a precaution to ensure citizens' safety, while funding for intelligence and security services was highly prioritized (Keenan, 2017). Following the Manchester arena bombing, the national security alert, was raised to the highest level 'critical' for only four days before returning to 'severe'; indicating that the UK was rather resilient to the threat posed by the terrorist violence and thus securitization intensity was low (Security Service MI5, 2019). Furthermore, there are no prominent securitization moves evident in the aftermath of the attacks, which also contradicts the French case and indicates that the UK did not securitize the threat to the same extent (Keenan, 2017). Prime Minister May, through her speeches, did not alarm the public, nor did she suggest taking extraordinary security measures, but rather emphasized, that "It is in these actions-millions of acts of normality-that we find the best response to

terrorism” (May, 2017b). These ‘acts of normality’, entailed the reinforcement of judicial and legal means, as well as the strengthening of intelligence services and domestic security (Keenan, 2017). This also suggests that, despite being hit by terrorism three times in three months, the British response lacked intense securitization since regulatory procedures were preferred and an emergency state challenging the balance of security and liberty did not occur.

Accordingly, in the wake of the London Bridge attack, the Prime Minister declared that defeating the current threat “Will not be accomplished through military intervention alone. It will only be defeated when we turn people’s minds away from this violence-and make them understand that our values are superior to anything offered by supporters of hate” (May, 2017c). These statements validate that a military-oriented approach is not favored, but the state has to take action at home, through deradicalization processes; a common action in a criminal justice response. By examining the Prime Minister’s statements, it can be interpreted that in stark contrast to the French case, there is clear reference to where the country falls short domestically, drawing attention to the national issues that must be addressed to effectively combat the threat. As evident by the statement “While we have made significant progress in recent years, there is, to be frank, far too much tolerance of extremism in our country” and by the subsequent review of the CONTEST strategy (Ibid, 2017c).

The evidence of the British response to the most recent threat supports the main argument, and it can thus be interpreted that the state securitized less than France, resulting in a criminal justice approach. Therefore, according to the indicators set, securitization levels are perceived to be low and the British response less hard-lined, making it a plausible explanatory factor for the variance.

Conclusion

The empirical analysis shows that despite sharing similar characteristics, the responses of the two countries towards the most recent terrorist threat, differ. In line with the main argument, the evidence validate that France followed a militaristic approach, whereas the UK opted for a criminal justice one. In the French case, a militaristic response is evident by the adoption of a warfare model, escalation of military interventions, declaration of emergency state, enhanced surveillance, high mobilization and increased funding of army and police. France intensely securitized the threat that was treated as an act of war towards the state and its citizens, justifying the hard-lined and repressive measures that were implemented during the two-year state of exception. In the aftermath of the Paris attacks specifically, prominent securitization moves from President Hollande that aimed to show a forceful response, are identified. Additionally, the country's domestic issues on counter-terrorism were absent from the political discourse. This thesis would argue that given the measures adopted and the context of the speech acts, the indicators set to measure the intense levels of securitization are met, supporting that high securitization levels affected the state choice to follow a militaristic approach.

In line with the criminal justice model, the case study of the United Kingdom, indicates that emphasis was given on the reinforcement of legal and judicial means, intelligence services, domestic security strengthening and deradicalization processes. The threat was perceived as a criminal activity towards Western democracies; and the country showed little to no signs of securitization through speech acts. In contrast to the French case, the shortcomings of the domestic counter-terrorism policies and the ineffectiveness in preventing extremism, were part of the political discourse and no severe security measures were implemented. Therefore, securitization intensity is perceived as low and the evidence indicate that this could result in a less hard-lined response.

The findings lend support to the main argument, as the empirical analysis indicates that France securitized the threat more intensely than the UK, and this thesis finds it plausible that the different levels of securitization could be an explanatory mechanism for each country's different strategic responses to terrorism in the years 2015-2019. This research, uses a framework of analysis that links the aspects of security and terrorism and endeavors to further contribute to the existing literature, as well as policy-making processes on these topics. However, the proposed explanatory mechanism cannot be completely separated from other previously suggested explanations, such as historical background and institutional setup. Thus, these mechanisms may be interrelated and may have caused or reinforced each other, implying that further research is needed. Furthermore, the observations may not be generalizable to other cases since France and the UK presented a unique and comparable security crisis with multiple aspects, in a short period of time. Future research could address some of these limitations and further explain the mechanisms that influence state responses to terrorism, by testing the hypothesis on other European countries or by applying different theoretical frameworks.

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