

# Return of the Jihadi: Analysing the Securitisation of Foreign Fighters Urso, Sara

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### Return of the Jihadi: Analysing the Securitisation of Foreign Fighters



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Abstract: As the need to repatriate Islamic State foreign fighters (FFs) becomes increasingly pressing following the collapse of the organisation in 2019, European states largely remain reluctant despite recommendations from academics, NGOs, and international bodies. None more so than the UK, which has enforced entry bans and citizenship deprivations for their FFs, a concerning development from one of the top three European countries that produced FFs (van Ginkel & Entenmann, 2016). Through the lens of securitisation theory, this study aims to shed light on how FFs have been securitised by analysing British parliamentary discourse on Shamima Begum, whose citizenship deprivation case remains a major topic in public debate due to her consequent statelessness. Two competing frames emerge: 1) the securitising 'National Security' frame; and 2) the counter-securitising 'British Democracy' frame. Although actors compete over what the real threat to Britain is, Begum or the government's policy approach, I argue that they both ultimately invoke the same Orientalist identities of the savage Muslim 'Other' against civilised British society, building on narratives of the 'enemy within' that historically subjected the Muslim community to increased scrutiny and stigmatisation.

## **Table of Contents**

1. Introduction	2
2. Literature Review & Theoretical Framework	3
2.1. Discourse, Securitisation, & Counter-Securitisation	3
2.2. Setting the Scene: Social, Historical, & Cultural Contexts	5
2.3. What is 'Britishness'? Examining the British Self-Identity	7
2.4. The Enemy Within: Islam, Migration, and Counter-Terrorism Policy	8
3. Research Design, Case Selection, & Methodology	11
3.1. Research Design & Case Selection – Single-Case Study	11
3.2. Methodology – Discourse Analysis	12
3.3. Data Selection & Collection	14
4. Findings & Analysis	15
4.1. Initial Securitisation Frame: National Security	16
4.2. Counter-Securitisation Frame: British Democracy	18
4.2.1. Use of Disclaimers	20
5. Discussion	20
6. Conclusion	23
References	24
Appendix 1	27

#### 1. Introduction

Four years after the collapse of the Islamic State (IS) in 2019, the international community was faced with the increasingly pressing issue of what to do with their foreign fighters (FFs) who had left to join the organisation. From a policymaking standpoint, there seems to be a consensus in the counter-terrorism field from scholars, NGOs, and international bodies that repatriation is the most appropriate response in terms of human rights and safeguarding (inter)national security (Mehra et al., 2023; Stenger, 2023; Masters & Regilme, 2020). Despite this, many European countries remain hesitant, only recently taking tentative steps towards returning FFs to their home countries (Acheson & Paul, 2020). Considering the speed with which many European countries amended their security policies following 9/11 and the 'war on terror' to combat the threat posed by Islamist terrorism (Prades, 2022), why are they so slow to act now when the research points towards repatriation as being the best solution to both protect human rights and prevent a resurgence of violence?

While there are likely various contributing factors, this paper focuses on the discourse surrounding the issue, with the aim of better understanding how state actors strategically frame the subject to promote controversial policies. Securitisation theory highlights the critical role that discourse plays in security: since discourse shapes how we interpret the world and what behaviour we deem possible or acceptable, strategic employment of certain discourses can be used by actors to justify otherwise unorthodox security measures (Waever, 1993). Therefore, this paper aims to answer the question: *how have foreign fighters been securitised?* 

Through the lens of securitisation theory, this study focuses on the case of Shamima Begum in the UK, who notoriously left the UK with two classmates to join IS at fifteen (Jackson, 2021). The analysis sheds light on how state actors invoked identities of 'Britishness' and the 'Muslim Other' to promote or criticise the Home Secretary's decision to strip her of her citizenship in 2019, a move which violated international law by leaving her stateless. State discourse is investigated through a discourse analysis of all parliamentary debates on Begum, revealing two competing (counter)securitisation frames: 'National Security' and 'British Democracy'. The findings indicate that, despite the presence of the 'British Democracy' counter-securitising frame advocating for Begum's repatriation, both sides of the debate ultimately reproduce Orientalist discourses/identities that present the Muslim community as the dangerous Other within British society. While discourse analysis alone cannot explain

why a phenomenon occurred, these findings help form a better understanding of the context in which Begum's citizenship deprivation was implemented and the broader implications it has on the Muslim community.

The paper first outlines the relevance of discourse and securitisation theory in policymaking. I then lay out the historical and cultural development of Muslim and British identities within the UK, and how these identities intersected in discourse and policymaking (counterterrorism policy in particular), setting out the context in which the current discourse is taking place. After explaining this interpretive study's research design and methodological approach, the final sections discuss the findings, limitations, and avenues for future research.

#### 2. Literature Review & Theoretical Framework

#### 2.1. Discourse, Securitisation, & Counter-Securitisation

Discourses are "sets of statements that construct objects and an array of subject positions" (Willig, 2014, p. 342), wherein language shapes reality by determining how we interpret the world and what actions we find acceptable or even possible in different situations. In the context of securitisation theory, first developed by the Copenhagen School (CS), discourse is used by actors to justify the implementation of extraordinary security measures (Balzacq, Léonard, & Ruzicka, 2016). The aim is to convince the audience that it is right/necessary to deviate from standard procedure, discursively reshaping reality to make different courses of action more acceptable (Altheide, 2006)—for example, the UK government making Begum stateless despite it violating international law. CS scholars originally identified four main features of the (successful) securitisation process: 1) securitisation is a performative process done through a *speech act* that presents the issue as a security threat; 2) the speaker must be a figure of authority, typically a state actor as they are ones most 'authorised' to speak on security issues; 3) the security issue is presented as an existential threat to the survival of the nation/community; and 4) securitisation is considered successful when extraordinary measures are implemented (Croft, 2012).

Since its development, the CS has been criticised on various aspects of the theory, most notably on its empirical application: how can one measure if the audience has accepted the securitisation? Are 'extraordinary measures' valid indicators of success? If not, then how can securitisation be assessed? Newer research within the field re-conceptualises securitisation as

a long(er)-term process, rather than focusing on a single speech-act event: Prades (2022) argues that securitisation is an intersubjective process that is embedded in its social context. Earlier theorists emphasised the performativity of the speech-act; Waever (1993) argues that the speech act is what establishes authority and that the success of the securitisation process depends on how much authority the speaker has rather than the broader context the speech act is occurring in. Later research in securitisation indicates that historical and cultural contexts play a critical role and also need to be considered. In their comparative study on the securitisation of migration in the US and France, Ceyhan (1998) finds that each country constructs the threat differently due to their different socio-historical contexts, leading to different policy reactions. Similar results were observed in Bourbeau's (2011) comparative study of the securitisation of migration in France and Canada, where the former has a much stronger level of securitisation compared to the latter despite similar discourses being present. These findings suggest that securitisation is a spectrum rather than binary, endorsing a more nuanced understanding of how successful securitisation can be assessed: if it exists as a continuum, some level of securitisation may have taken place but not necessarily to the end of extraordinary measures. Prades (2022) argues that, rather than directly leading to extraordinary measures, securitisation can "frame public debates, and thereby broaden or reduce the legitimate scope of action" (p. 30), which highlights how important it is to policymaking.

Building on the idea that securitisation is a continuum, Stritzel & Chang (2015) develop the concept of counter-securitisation in their analysis of the US/NATO and Taliban discursive interactions in Afghanistan as they compete over the dominant securitising frame. Their research addresses a gap in the original CS theory's superficial understanding of resistance to securitisation, they flesh out the concept of counter-securitisation. and SO Counter-securitisation can take on various formats but is, in essence, a new/different securitising frame that is being pushed by opposing elites to resist the original securitisation, to delay, reverse, or prevent the measures promoted by the original securitisers. They argue that securitisation and counter-securitisation are interactive and iterative processes, describing it as a "prolonged action-reaction game" (p. 552), also highlighting that part of this game is delegitimising the opposing agent whilst establishing your legitimacy as a securitising authority.

Although Stritzel & Chang (2015) apply their counter-securitisation theory in the military context, Paterson & Karyotis (2022) adapt it to a social one in their discourse analysis of elite

framings of British identity and attitudes towards migration. The authors find that politicians and other relevant securitising actors had differing views on what constitutes British identity in relation to migration, with securitising actors framing migration as a threat to 'Britishness' by allowing intolerant/undemocratic foreigners into the country, thereby threatening the British character for tolerance. Counter-securitising actors reframed the issue, where the real threat to British character of tolerance was from the original securitisation of migrants as a threat, and the way to protect British identity is by accepting migrants. These findings are particularly significant as they represent a securitisation pattern that also emerges in Prades' (2022) exhaustive discourse analysis on the securitisation of Islam and migration in the UK, as well as the findings of this study. In both cases, the text demonstrates a division amongst UK political actors on what it means to be 'British' and how the 'other' fits in; whether ethnic minorities are to be embraced or viewed as a threat.

Combining Prades (2022) and Stritzel & Chang's (2015) conceptualisations of securitisation—viewing it as an interactive process that is socially and culturally embedded—allows for a more nuanced analysis of how FFs have been securitised, looking beyond the more static interpretations of the original CS to consider the broader context in which these 'speech acts' occur. This led to the conclusion that, despite having all the hallmarks of counter-securitisation, actors within the 'British Democracy' frame were still reproducing the same Orientalist rhetoric that has been historically used to define British self-identity in contrast to the Muslim/Arab Other (Said, 1978).

Understanding how Islam and migrants have been historically securitised in the UK is therefore critical to answering the research question. As Prades (2022) argues, securitisation does not exist in a vacuum, rather it is built upon pre-established national narrative frameworks and "semantic repertoires" that the audience is already familiar with (p. 34). Therefore, establishing the historical and cultural context is essential to deciphering how the current discourse fits within the broader social consciousness, what identities it invokes, and what the implications are.

#### 2.2. Setting the Scene: Social, Historical, & Cultural Contexts

To address the question "How have foreign fighters been securitised?", it is fruitful to first understand what the political, humanitarian, and security implications are for refusing to repatriate FFs to fully capture what it means for the UK to adopt this policy. Foreign fighters are "individuals from third countries who travel to join a terrorist group to support its

activities" (Mehra et al., 2023, p. 1). This includes individuals who may not have directly participated in active combat, as logistical support (roles that are often relegated to women) is key to the organisation's survival and success (Stenger, 2023). For the purposes of this study, 'FFs' refers specifically to those who joined IS, as its collapse is what triggered the repatriation issue at hand, and this is the most politically salient understanding of FFs in current European discourse (Stenger, 2023).

The British government estimates that approximately 900 British citizens have left the UK to join IS (Hansard, 2019a), and while the data is uncertain, the European Council (2023) estimates that 4,000–5,000 Europeans have "travelled or attempted to travel to conflict zones". After the collapse of the 'Caliphate' in 2019, these FFs have dispersed across the region of Syria and Iraq, with many of them staying in refugee or detention camps while attempting to return to their home countries (Stenger, 2023). Conditions at these camps are dire, with limited access to hygiene, food, or healthcare, contributing to major disease outbreaks and fatalities, including children (Limbada & Davies, 2016; Stenger, 2023). Aside from the human rights concerns raised by the deplorable camp conditions, states' refusal to repatriate their criminals, leaving them to be tried by local authorities in Syria and Iraq effectively strips FFs of their civil rights as they have very limited/no access to justice and legal advice—e.g.: forty foreign female IS supporters were sentenced to death in Iraq following ten-minute hearings in 2018 (Chulov, 2018).

Furthermore, leaving FFs essentially to their own devices will contribute to increasing instability in the region and internationally, with several academics and NGOs warning of the risk of a resurgence in violence as the continued exposure to IS doctrine within the camps will "breed a new generation of ISIS militants" (Acheson & Paul, 2020, p. 3). There is precedent to support these assertions: Stegner (2023) cites how in the 1990s, foreign fighters in Afghanistan who were stripped of their citizenship later turned to more violence, with one notable example being Osama Bin Laden. Despite their initial reluctance (Acheson & Paul, 2020), all other Western European countries have by now taken some measures to repatriate their FFs. Therefore, the UK's refusal to repatriate along with the wholesale citizenship deprivation practises stands in sharp contrast to their neighbours' (Siddique, 2023), particularly considering how being a democratic country "founded on rule of law" is significant to British national identity (McMillan, n/d).

#### 2.3. What is 'Britishness'? Examining the British Self-Identity

Discourse plays a significant role in shaping identity: discourse can and has been strategically employed to (re)define identities, determining how we interact with others. On a national level, national identities are shaped through a variety of discourses that essentially outline the requirements for a person to be considered one of 'us' (Croft, 2012). It is impossible to concretely determine how an entire population perceives their national identity, so asking what it means to be British is a question that will undoubtedly be answered differently depending on the individual. Defining 'Britishness' has been an ongoing process by various actors, each drawing on different parts of British history to present a specific image of what it means to be British. Prime Minister Tony Blair's numerous speeches in the late 1990s arguably contributed significantly to the contemporary construction of Britishness: through his discourse, he asserted the idea that Britain is a nation of tolerance, diversity, inclusivity, and justice, shaping the post-war national identity and inundating these values as part of the "new common sense" in British national discourse (Croft, 2012, p. 159).

These recurring discursive narratives on inclusivity and fairness have been noted by scholars through discourse analyses relating to British identity. 'Tolerance', as Paterson & Karyotis (2022) label it in their mixed methods analysis of British identity, is still considered a prominent British value in national discourse. Based on the idea that Britain is an inherently accepting and fair society, the tolerant identity stems from liberal democratic values which include minority protection and freedom of expression (Paterson & Karyotis, 2022; Prades, 2022). Unlike other similar European countries (e.g.: Germany) where the idea of assimilating minorities may be more salient in public discourse (Prades 2022), British legal/institutional structures and political rhetoric suggest that, historically and culturally, the UK did not view ethnic minorities as a hurdle to social cohesion and typically welcomed the integration of different communities (Prades, 2022; Croft, 2012; Brunn, 2012; Vertovec, 2007).

Considering this national identity of being a just, fair, nation built on rule of law and inclusivity, the decision to violate human rights through rendering Begum, a British citizen by birth, stateless (and the broader context this is occurring in, where the UK is refusing to repatriate FFs despite the threat it poses to the international community) appears to conflict with this identity. However, identity is not formed in isolation, but rather through interactions with other groups: it is through determining how 'We' are different from 'Them' that the

borders of self-identity are more concretely delineated. In fact, Prades (2022) argues that securitisation is a "mirror" for nations' self-construction (p. 28), meaning that states use securitising narratives to outline who the out-group is that 'we' need to be protected from, and they (re)define the borders of who the in-group is through this process. This is why discourse plays a critical role in policymaking, as it can be used to shape what/who is the threat and who exactly is one of 'Us' and not 'Them'. The permeation of the 'war on terror' discourse in the UK post-9/11 and the 7/7 London bombings reignited the debate around what Britishness is, and who is(n't) allowed to be a part of it, ultimately leading to the stigmatisation and othering of the Muslim community.

#### 2.4. The Enemy Within: Islam, Migration, and Counter-Terrorism Policy

Despite developing a self-identity around tolerance and democracy, research demonstrates that this identity can be activated in competing ways when determining how to respond to a perceived issue. As postcolonial Britain became increasingly multicultural—a process aided by the EU's free movement—migration and its impact on British society was heavily debated, largely due to the influx of Muslim migrants (Prades, 2022). Discourse analyses on the securitisation of migration in Britain indicate two distinct camps around the conception of 'Britishness': 1) those that considered inclusivity and plurality to be essentially British values, meaning that 'Britishness' entails embracing migrants and minority cultures, and 2) those that viewed migration as a cultural threat due to the incompatibility of Islam with British values (Prades, 2022; Paterson & Karyotis, 2022; Croft, 2012).

Historically, Muslims and Arabs have been constructed as the cultural 'Other' in colonial Britain, as they were across much of the Western world. Said (1978) argues that Western identity and narratives of superiority were created and reproduced through Orientalist discourse, where the Orient was depicted as violent, irrational, and backward in comparison to post-Enlightenment Europe, presented as a rational and civilised society. These constructions of the inferior Oriental Other justified Western cultural and moral superiority, whilst simultaneously flattening the Orient into one homogeneous group that encompassed anyone brown, Arab, or Muslim. Initially, this rhetoric was used to justify colonial expansion under the guise of bringing civilisation to the savages. Today, Hesse & Sayyid's (2006) analysis of how ex-colonial immigrants are perceived in the UK concludes that they represent a sort of national failure: failure to revive the empire or regain their international status after the Cold War. As such, the British Asian ("BrAsian") immigrant is constructed not as a full

citizen but not as a foreigner either, caught in a limbo between 'us' and 'them', which indicates that despite having equal citizenship rights, ethnic minorities were still existing on the outskirts of the British 'in-group'.

With this history in mind, it is unsurprising how quickly the Muslim community was identified as the threatening Other following the 7/7 London bombings in 2005. The culprits being British citizens ignited a fear of 'homegrown terrorism' and increased scrutiny towards the Muslim population of the UK. Croft (2012) argues that the onset of 'homegrown terrorism' and the 'enemy within' in the discourse led to a reconfiguration of 'Britishness': 'being British' was less about tolerance and fairness, and more about setting standards for how Muslim Brits/BrAisans should behave to prove they do not support homegrown terrorism, where merely practising Islam could be construed as disloyalty to British values (Mythen et al., 2013; Altheide, 2006; Fekete, 2004; Masters & Regime, 2020).

The idea of the 'enemy within' was reignited more recently with the securitisation of migration following the refugee crisis in 2015, a debate that resulted in Britain leaving the EU largely to regain control over their border and reduce the number of (Muslim/brown) migrants (Prades, 2022). De Genova outlines how the securitisation of the 'migrant/refugee crisis' evolved to interlink migration with Islam and terrorism, all a threat to European values and way of life. The public hysteria over the refugee crisis reached a fever pitch in 2015, the string of Islamist terror attacks in Europe gave tangible evidence of the danger the 'migrants' represented (even though the attacks were carried out by citizens and not refugees/migrants). After the attacks, asylum-seekers were more concretely viewed as threats to European civilisation and refugee camps became securitised, viewed as hotbeds for crime and extremism. By the end of these developments, Islam was viewed as the ideological antithesis of European culture and utterly incompatible. Since Islam stretches across nationalities and ethnicities (including European citizens and non-citizens), the result was a nexus that conflates migrants, terrorists, and Muslims in general, where the securitising discourses of one applied to all the others.

The outcome was the constant suspicion towards Muslims in Europe because their identity supposedly naturally lends them towards radicalisation and violence. However, European discourse attempts to 'neutralise' this suspicion by presenting it as a security matter rather than a racialised response (De Genova, 2017; Mythen et al. 2013; Prades, 2022). This dynamic was also evident in this paper's findings as the 'National Security' frame attempts to

justify citizenship deprivation on the grounds of public safety despite the racialised/Orientalist discourse and identities it is built on. The impact of these discourses should not be understated, as despite the superficially neutral wording, the implementation of counter-terrorism (CT) policies reveals how these biases emerge in practice.

De Genova (2017) goes as far as describing the UK's CT policies as "state-sanctioned Islamophobia" because of how disproportionately they target the brown/Muslim communities (p. 1768). Fekete (2004) demonstrated how the post-9/11 expansion of the security state across Europe, including the UK, institutionalised what they termed 'xeno-racism', where all Muslim minorities were treated as 'migrants/terrorists' because they are Muslim, regardless of their citizenship status. For example, the 'Prevent' pillar of the UK's CONTEST CT programme revolves around preemptively intercepting the 'radicalisation' of youths by training teachers on how to spot and report signs of radicalisation. This programme has been heavily criticised for policing which identities are acceptable, attempting to shape students' worldviews to align with the state's conception of what is correct, and for being predominantly implemented in schools in Muslim neighbourhoods, targeting Muslim identities (Mythen et al., 2013; O'Donnell, 2015; Martin, 2019).

Mythen et al.'s (2013) series of interviews with British-Pakistani youth demonstrate the impact of British stop-and-search policy at the micro level. Respondents reported feeling constantly scrutinised and resorting to self-censorship to avoid state attention. The authors concluded that the expansion in CT policies which disproportionately targeted brown/Muslim communities created a "state of partial security" (p. 384), where the majority (white) population is treated like the subject of protection and ethnic minorities are viewed with suspicion and considered more 'risky'. Croft (2012) and Fekete (2004) similarly describe how the creation of the 'enemy within' stigmatises the entire Muslim community, making them 'guilty until proven innocent' because their citizenship was not sufficient evidence that they are one of 'us'.

It seems that despite the British self-identification with values of tolerance and liberal democracy, the construction of the Muslim Other persists strongly through both CT policy and securitisation discourses which have interlinked migration, terrorism, and Islam. Understanding that the Muslim/'BrAsian' community was never fully accepted as a part of the in-group despite their citizenship status, it becomes clearer how the UK government invoked these identities to justify making Begum stateless regardless of international and

legal convention. The literature demonstrates that the Muslim identity in the UK trumps citizenship: being a Muslim is more significant than British citizenship when it comes to determining in- and out-groups. This is the context in which the securitisation of FFs takes place.

The next section explains the relevance of this case study on the broader issue of FFs, outlining the research design and methodology before discussing the findings.

#### 3. Research Design, Case Selection, & Methodology

#### 3.1. Research Design & Case Selection – Single-Case Study

By the British government's estimation, 400 British FFs remain abroad and are likely to attempt to return to the UK (Hansard, 2019a). Yet unlike their European neighbours, who in some cases introduced repatriation operations—although predominantly focusing on women and children—(France24, 2022), the UK seems to have shuttered their borders, not only refusing to repatriate FFs but also stripping some of their citizenship and preventing them from returning to the UK, even for a criminal trial.

Among the varied responses from states, the United Kingdom remains the only country in Western Europe refusing to repatriate their FFs and practising citizenship deprivation in "bulk" (Siddique, 2023). The UK is one of the top three exporters of FFs to IS in Europe (van Ginkel & Entenmann, 2016), which makes their state policies pivotal in the counter-terrorism field and international security in general. Considering their approach to citizenship deprivation and refusal to repatriate is unique in the region, the case warrants further investigation on these grounds.

This is a single-case study of one FF: Shamima Begum. One of the more controversial developments under the UK's policy approach was the Home Secretary's decision to strip Shamima Begum of her citizenship in February of 2019, rendering her stateless, a decision that was later reaffirmed after she lost her appeal at the Special Immigration Appeals Council in February 2023. Begum, who has long been the subject of intense media scrutiny following her departure to join IS at fifteen with two of her classmates, was once again at the centre of public debate over the controversy of her statelessness.

Begum was selected as a case due to the level of media and public attention she has garnered across her entire IS journey, from her departure at fifteen to her interview with The Times from a refugee camp in 2019. During this interview, Begum expressed a lack of remorse for joining IS, claiming that she had fun (Jackson, 2021). Two weeks after the interview was aired, the Home Secretary had stripped her of her British citizenship, and she has since been unsuccessfully attempting to appeal the decision. Although by the Home Secretary's own admission, over one hundred individuals have been stripped of their citizenship under similar circumstances to Begum (Hansard, 2019c), the hyper-fixation on Begum is what arguably brought the debate on repatriation and citizenship status to the fore, as most if not all other FFs that had been previously deprived are virtually unknown and had little impact on public discourse in comparison to the media frenzy Begum generated (Jackson, 2021).

Therefore, Begum is the ideal case through which to study this phenomenon: considering the focus of this research is on discourse, she has been central to mainstream debates on this topic. More importantly, she seems to transcend individuality to an extent: Begum's name has become synonymous with FFs in a sense, and therefore analysing discourse surrounding her can be informative of how other FFs are securitised, which is very useful in addressing the research question. As discourse is highly dependent on the socio-historical context it is embedded in, generalising these findings to other European countries should be exercised with caution, but the results are still useful as they offer a comparison point when looking at other European discourses on the subject.

#### 3.2. Methodology – Discourse Analysis

This is an explorative study that aims to investigate how foreign fighters have been securitised, focusing on the UK's seemingly unusual response to the recent issue of repatriating FFs. Because of securitisation theory's focus on how language can shape policy, discourse analysis is the most suitable method to answer the question.

Discourse analysis uses an interpretive methodology which focuses on "understanding the production of social meaning" (Prades, 2022, p. 69). Discourse plays a significant role in shaping reality since it determines what we conceive of as possible or acceptable actions. It should be noted that it is difficult to explain causation through discourse analysis. Hansen (2006) argues that it is not possible to observe causation through discourse as it would require the independent observation of an independent and dependent variable, which cannot be done since social structures and actors mutually shape/construct each other. Prades (2022) argues

that the causality of discourses, which shape social meaning, can be understood the same way causality in constructivist theories of IR is: by focusing more on how these narratives constitute reality. How does discourse shape what actors think is possible or appropriate? Discourse analysis cannot explain *why* the UK has adopted this response to FFs, but it is still relevant as it informs us how public debate was shaped to indicate what policies or actions were appropriate (Altheide, 2006; Stritzel & Chang, 2015).

Discourse analysis aims to reveal the mechanisms within speech that serve to persuade the audience, evoke certain emotions, or shift their perceptions (Abdelal, 2009), therefore this research is by nature qualitative. Qualitative analysis can capture more complex themes in the text that would escape a quantitative approach, through the interpretation of the linguistic choices, cultural references, and tone, and is therefore suitable for this research question where investigating the construction of identity is central to the analysis.

Hsieh & Shannon (2005) define qualitative content analysis as "a research method for the subjective interpretation of the content of text data through the systematic classification process of coding and identifying themes or patterns" (p. 1278). Using a systematic coding frame to analyse text is an effective way to balance out the subjectivity that is inherent in human coding by introducing a degree of quantitative measure. The use of a coding frame in a qualitative content analysis does not mean that the data is analysed through counting, rather, the coder "deeply investigate[s] the use of language and classif[ies] large numbers of text categories that reflect the meaning of text" (Prades, 2022, p. 71).

For this analysis, a coding frame was constructed both inductively and deductively. First, based on the relevant literature on the securitisation of migration and terrorism, key discourses were identified and turned into (sub)categories. The consensus within counter-terrorism scholarship is that there is a nexus between discourse Islam, terrorism, and migration (Paterson & Karyotis, 2022; Fekete, 2004; Prades, 2022), and so when determining the thematic starting points for coding, I first relied on Huysmans' (2000) seminal work which describes four axes along which migration is securitised: identity, security, political stability, and economics. In other words, discourse would present migration as a threat to one of these axes within the nation (e.g.: arguing that migrants will cause political instability). These themes also emerge in discourse on Islam and terrorism, and further research on these topics was used to supplement the categories (Paterson & Karyotis, 2022; Léonard & Kaunert, 2019; Martini, 2023; Stenger, 2023; Croft, 2012). Not all categories initially collated

were relevant, and new categories were created as certain themes and narratives recurred across the text. The coding frame was refined and the text was re-coded (see final coding frame in Appendix 1). These codes were operationalised by looking through the text for arguments that e.g.: used ideas of security or cultural identity either for or against repatriation/citizenship stripping. The content was then synthesised into the two competing securitisation frames of 'National Security' and 'British Democracy'.

As this was an exploratory study, I initially included categories for gendered discourse derived from literature on violent women (see: Martini, 2018; Gentry & Sjoberg, 2015). However, the analysis revealed that the gender dimension was not nearly as relevant to the discourse as the more racialised narratives based on migration discourses. While some aspects of gendered discourse were present, mostly in attempts to victimise Begum, I ultimately concluded that gender did not play as significant a role in the discourse as the racial/ethnic aspects. The question of gender is discussed in the final section.

#### 3.3. Data Selection & Collection

As my focus was on how the state justifies a controversial policy approach, state-produced discourse was required, therefore transcripts of all British parliamentary debates that discuss or refer to Begum were used for analysis. Studying state discourse in particular is insightful, as state actors play a significant securitising role due to their position of authority, and media sources have been demonstrated to rely on 'official' state discourse when producing news reports that disseminate into the mainstream (Croft, 2012; Altheide, 2006). Within the British context, these parliamentary debates are live-streamed and the verbatim transcriptions are available online, therefore I argue they serve as an important indicator of the kind of discourse state actors want to present to the public.

The decision to focus on parliamentary debates specifically partially stems from the central position that the institution plays in UK politics and its representation of the major political forces in the country (Prades, 2022, p. 188). Because of the importance of Parliament's position within the state structure, all members of the parliament (MPs) were treated as valid securitising agents and all discourse produced in Parliament was relevant to the question.<sup>1</sup> The debate format was also of interest to this study as it essentially serves as a forum for

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<sup>&</sup>lt;sup>1</sup> Since my goal is to investigate the discourse and not to determine which frame 'succeeded' as developments are still unfolding, it is not relevant whether one speaker has more 'authority' than another (e.g.: the Home Secretary) as that doesn't influence the content of (counter-)securitisations.

actors to compete for the dominant securitising frame as a part of the "prolonged action-reaction game" of securitisation (Stritzel & Chang, 2015, p. 552). Overall, Parliament offers a snapshot of the discourse that different state actors are producing about Begum and FFs, demonstrating how they are directly interacting with competing narratives, which makes the data from this forum useful for answering the question.

The data was collected from the official Hansard online Parliament database, which uploads transcripts of all Parliament debates. Variations of the keywords "Shamima Begum", "jihadi bride", "Bethnal Green", and "foreign fighter" were used to filter out the relevant speeches. The initial keywords were deliberately less specific as each transcript was then manually assessed to determine if it was relevant to the research. This process of manual selection reduced the chances of omitting relevant data. All debates where Begum was referred to were of interest as they would illustrate what securitising frames actors would employ around her and how they promote it. In total, 21 debates of varying lengths were analysed, ranging from February 2019 to March 2023, comprising the entirety of the relevant sample (to the best of my knowledge).

Although the issue was most salient in 2019 right after the Home Secretary's announcement that he would be stripping Begum's citizenship (which is reflected in the data as almost half the transcripts are from 2019 debates), all parliamentary debates to date referring to her were collected for the sake of completeness and a better understanding of whether the discourse shifted over time. Ultimately, the discourse for both securitising and counter-securitising frames remained consistent across the entire time period. Overall, this amounted to approximately 170 pages' worth of relevant text, which should provide an idea of how heavily debated the subject was at Parliament.

#### 4. Findings & Analysis

Discourse from the Parliamentary debates revealed two competing frames, the initial securitisation frame of 'National Security' that is predominantly promoted by the Home Secretary, and the counter-securitising frame of 'British Democracy' that was promoted by MPs from almost every party in Parliament, including the Conservative party which forms

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<sup>&</sup>lt;sup>2</sup> Examples of the variations include searching for 'Shamima' and 'Begum' on separate instances, or 'ISIS/ISIL bride' instead of 'jihadi bride'.

the government. Although these debates occurred across a period of four years, the arguments and discourses employed remained consistent across the entire period, and as such I speak of the 'discourse' as a whole. Upon comparing discourse from the House of Commons and House of Lords, there was also no discernible difference in the discourses and arguments employed or the party affiliations of the actors that employed them.

The initial securitising frame 'National Security' presented Begum (or rather, her return) as the existential threat, and the referent object (what the securitising actors claim needs to be protected) was public safety/security; the only way to ensure national security was by completely preventing Begum's reentry to the UK. The counter-securitising frame that emerged in resistance to this agenda was labelled 'British Democracy', and it reframed the referent object as the British identity rather than national security. The label 'British Democracy' is used to encompass the values conceived as essentially British: tolerance, rule of law, fairness, as well as the international dimension of British identity—how they are perceived by other countries as holding all these values. Within this frame, the threat was presented as stemming from the government's policy approach, which was undermining British identity by violating international norms and rule of law. The analysis revealed that both the securitising and counter-securitising frames indirectly reproduced the Orientalist rhetoric at the core of securitisations of Islam/migration.

#### 4.1. Initial Securitisation Frame: National Security

The main securitising actors promoting this frame in parliament were the Home Secretary and some of the Conservative MPs, which was (and at the time of writing, still is) the party forming majority government, many of whom held ministerial positions in the government. Despite the Home Secretary changing five times within this time period, their discourse also remained consistent, oftentimes repeating some variation of how "[t]he primary objective should be the safety and security of all those who live in the United Kingdom" (Hansard, 2019a). For these reasons, I view this securitisation frame as being promoted by the government in power, compared to the counter-securitisation frame which is employed predominantly by MPs who are not holding offices within the Cabinet but are still technically state actors.

This frame presents Britain as facing an acute security threat from foreign fighters like Begum, where the only solution to protect the referent object—in this case, national security—is through citizenship deprivation and preventing reentry. Although this frame

presented national security as the referent object, the threat to identity is a strong underlying message. Actors that presented the argument of Begum being a security threat to the public followed the typical discursive patterns of securitisation of migration and Islam (Paterson & Karyotis, 2022; Fekete, 2004; Huysmans, 2000). She was depicted as violent, depraved, and dangerous, and therefore should be kept out of Britain by all means necessary for the sake of national security. The speakers would draw on established Orientalist stereotypes of the 'irrational violent Muslim', using strong emotive language that evokes fear and disgust of Begum and her counterparts, invoking 'Us' versus 'Them' group identities. An example of this is the Home Secretary's rhetoric during a debate on the deprivation of citizenship:

They turned their back on this country to support a group that butchered and beheaded innocent civilians, including British citizens; tied the arms of homosexuals and threw them off the top of buildings; and raped countless young girls, boys and women. (Hansard, 2019d)

His use of graphic language and the pronoun 'they' further isolates Begum from the British citizenry, locating her in a group that directly opposes and threatens 'us' ("this country"). The violent descriptions highlight the contrast between 'us' and 'them', drawing on the colonial narratives of the West being civilised and superior in comparison to the savage, barbaric Oriental Other (Said, 1978; Masters & Regime, 2020).

This is also where discourse on Begum's disloyalty is particularly relevant: numerous disbelieving comments were made about her lack of remorse regarding her actions and how she has deeply betrayed the nation. In another debate, Victoria Atkins, the then-Minister for Safeguarding (a joint position within the Home Office and Ministry of Justice), repeats the Home Secretary's sentiments verbatim, saying "[t]hey turned their back on this country to support a group that butchered and beheaded innocent civilians, including British citizens." (Hansard, 2019b). The focus on the betrayal within this sentiment serves to delineate the in and out-groups, indicating that Begum *chose* to 'turn her back on' Britain and willfully placed herself out. Her agency in this betrayal serves to justify her formal exclusion from the polity through citizenship deprivation: why should she be entitled to remain British after she declared herself an enemy of the country?

Overall, this frame aims to legitimise citizenship deprivation as a legitimate security tool by invoking these competing identities, showing that Begum willfully rejected 'Us' to join 'Them', and because of how barbaric 'they' are, deprivation is not only valid but necessary to

keep the nation safe. Almost all debates in 2019 involve the Home Secretary reiterating that "[d]eprivation is a powerful tool that can be used only to keep the most dangerous individuals out of this country, and we do not use it lightly. [...] The power has been in place for more than 100 years." (Hansard, 2019d). This was arguably in response to heavy criticism from counter-securitising MPs, which condemned the government's response not only because it was breaking international convention, but also undermining British democratic rule of law. This example demonstrates how the Home Secretary attempts to counter these claims by presenting deprivation as a long-standing measure and therefore following democratic/legal norms. In reality, the powers to deprive on the grounds of it being conducive to the public good (as was the case with Begum) were only introduced in the 2002 Asylum Act (Fekete, 2004).

Despite some reassurances that deprivation will not violate international or domestic laws, the Home Secretary makes it clear that even if it did, "the Government's first priority is to protect this country and do whatever is necessary" (Hansard, 2019c). The implication is that they are willing to sacrifice adherence to human rights and international law for national security, because of how serious the threat Begum represents is.

#### 4.2. Counter-Securitisation Frame: British Democracy

This counter-securitisation frame challenges the initially proposed threat (Begum) by presenting an alternative threat: the government policies themselves. Here the referent object is not security but rather identity, more specifically Britain's adherence to democratic norms, rule of law, and general self-identity as a 'tolerant' state (Croft, 2012; Prades, 2022; Paterson & Karyotis, 2022).

The frame directly challenged the initial securitisers' assertion of Begum and FFs as a major security threat. In line with Stritzel & Chang's (2015) description of counter-securitisation dynamics, MPs challenged the presented existential threat by highlighting that Begum is a young woman who has publicly admitted to joining and supporting a known terrorist organisation; how is it possible that she could not be prosecuted due to lack of evidence, making deprivation the only available solution (Hansard, 2019b)? By reframing the referent object and challenging the supposed existential terrorist threat, this counter-securitisation frame aims to delegitimise the original securitisers by demonstrating that *they* are the real threat to Britain, not Begum. The government's refusal to repatriate and practice of

deprivation is presented as a critical threat to British values of democracy and rule of law, undermining the national Self not only domestically, but internationally.

In fact, the international aspect played a central role in this frame, as MPs almost always compared the UK to their Western neighbours to highlight how Britain is falling short. One example is MP Gavin Newland's (2019) statement during a debate on repatriating IS FFs:

The UK has been described as being in the "vanguard of citizenship deprivation", with an approach that contrasts starkly with that of other European countries, such as France and the Netherlands, which have returned their citizens from Iraq and Syria to face justice at home. [...] Even Donald Trump tweeted that the UK should "take back" Daesh fighters captured in Syria and "put them on trial." Surely that shows just how out of step with the rest of the world we have become.

His somewhat deprecating reference that "[e]ven Donald Trump" thinks the UK is mismanaging the situation highlights the sense of indignity that underlies this frame. Counter-securitising MPs repeatedly placed the current government's approach in an international context to demonstrate how it is undermining British identity on all fronts, both losing its democratic character internally by violating rule of law and also diminishing British standing abroad by being the only European state to violate these norms to such an extent. I found that this also drew on elements of the colonial identity, as if to say that Britain is losing its claim to cultural superiority by falling short of its Western peers. This narrative of maintaining their international position is particularly clear in references to how they have a responsibility to the world, particularly about not "dumping [their problems] on poorer countries", as MP Joanna Cherry phrased it (Hansard, 2019a).

A particularly illustrative example is Labour MP Khalid Mahmood's assertion that "[w]hat sets us apart from those radicalisers and terrorists and their barbaric ideology is the rule of law." (Hansard, 2019d). Here the dichotomy between civilisation and barbarity in Orientalist discourse that Said (1978) describes is evident: by not following rule of law, Britain loses its claim to cultural superiority and the only way to protect this identity is by adherence to the system.

Overall, this frame predominantly focuses on what Begum's deprivation means for Britain. MPs draw on the idea of rule of law being a foundational characteristic of Britain. Much of the discourse revolves around duties and responsibilities, painting the issue as not one of security but of morality: counter-securitising actors evoke the British 'democratic/tolerant'

identity to say that the UK is morally obligated to repatriate Begum (or at the very least not strip her of her citizenship). Here, the UK losing its foundational character as a democratic state built on rule of law is presented as a much bigger threat to the nation than Begum returning to British soil.

#### 4.2.1. Use of Disclaimers

A recurrent theme in this frame which weakened their counter-securitisation attempt was the frequent use of disclaimers regarding the reprehensible nature of Begum and other FFs. Before developing their own argument for why refusing repatriation is undermining British democracy, MPs would inevitably acknowledge that Begum is a dangerous Other. For example, Claire Fox prefaces her argument that the UK is still responsible for Begum by saying "Shamima Begum admitted on the BBC podcast that she willingly chose to join a barbaric, nihilistic, Islamic death cult, so I am not sure about compassion" (Hansard, 2023), reiterating much of the Orientalist rhetoric discussed in the first frame.

By repeatedly acknowledging this element of danger and 'otherness' in the 'National Security' frame, counter-securitising actors weakened their position because they legitimised the very frame they were trying to oppose. They acknowledged that Begum does pose a security threat by reaffirming the Orientalist discourse that the securitisers produced, undermining their attempts to frame Begum as 'still British responsibility' because they confirm her membership to the dangerous out-group.

#### 5. Discussion

This analysis revealed the ongoing competition within British state discourse over the securitisation of FFs, particularly regarding the question of repatriating them. This competition would not have been initially apparent if one were to only look at the counterterrorism policies that the state adopts, which remain firmly against repatriation (Sabbagh, 2023).

A closer look at the literature reveals that this is a common pattern in UK securitisation discourse: as discussed above, Paterson & Karyotis (2022) reveal a strong counter-securitisation frame regarding migration in British discourse from 2005-2015. Prades (2022) and Croft (2012) similarly conclude that British securitisation discourse on both

migration and Islam tends to be divided between those who conceive these 'issues' as threats to the survival of British identity, versus those who view accepting these minorities as essentially British. Therefore, it is not surprising to see another manifestation of this division in the securitisation of FFs. What *was* surprising, however, was the similarity between these two competing frames in how they both reproduce, implicitly or explicitly, the Orientalist discourse at the core of this debate.

Although the reproduction of Orientalist discourse was more obvious in the securitising frame as discussed above, I argue elements can be found within the constructed identities of the counter-securitisation frame. Firstly, the desire to preserve British cultural superiority is evident in the international focus of the discourse; there is a concern over Britain's status within the international community, particularly through the comparisons to their Western neighbours' adoption of repatriation policies against their violations of international law. Secondly, and perhaps more significant, is how their use of disclaimers asserts the idea that Begum is the savage Oriental Other. It is admittedly difficult to defend someone who has joined a terrorist organisation and participated in horrible acts of violence, so how else could they have spoken about her? Martini (2023) analyses how the global counter-terrorism agenda's silence on white terrorism reinforces the racialisation of terrorism, and her findings act as a useful point of contrast. Studying the UNSC, she finds that Islamist terrorism is constructed "as a transnational and monolithic phenomenon" (p. 262), but far-right/white supremacist terrorism is always spoken of at the level of the individual: terrorist attacks are presented as isolated incidents by troubled individuals and disconnected from the white supremacy structures that motivate them. Therefore, it is clear there are different ways to speak about terrorists, and in this case, both frames speak about Begum as the personification of the 'enemy within' trope discussed above (Croft, 2012; Fekete, 2004).

Upon reflection, I had expected to find more of a victimising narrative to justify the need to repatriate Begum, in line with gendered discourse on violent women that diminishes their agency (Martini, 2018), to say that she needs some form of help. Instead, the second frame also presented Begum as violent and dangerous. What are these two frames really competing over? It is not over where Begum fits between Us and Them, but rather how Britain should respond to the 'enemy within'. 'National Security' securitisers want to exile the homegrown terrorist, whereas 'British Democracy' counter-securitisers argue Britain must take responsibility because "she was radicalised in Britain—she is our problem to sort out" (Hansard, 2019b). The counter-securitising frame does not challenge but rather reproduces

the Orientalist rhetoric, which suggests these identities are deeply entrenched in British state discourse.

There are severe implications to the reproduction of this discursive motif of the 'enemy within' particularly within this debate. Citizenship revocation is serious, especially if the outcome is statelessness: it reduces the individual to a *homo sacer*—a nonentity with no access to the law and beyond its protection. Securitisation scholars demonstrated that extraordinary measures introduced in the context of an emergency are often then routinized, becoming a part of the status quo. To point to a British example, the securitisation of migration and its subsequent conflation with terrorism led to extreme measures that were initially expected in special circumstances, like external borders, to expand into ordinary life; e.g.: increased surveillance and empowerment of local law enforcement to carry out random searches (Mythen et al., 2013; De Genova, 2017). Therefore, it is concerning to observe how British and Muslim identities have been portrayed as incompatible from both sides of the debate in this analysis, as it has been demonstrated how discourse can bias the implementation of seemingly neutral CT legislation (Mythen et al., 2013; Fekete, 2004).

What does this mean in reality for the Muslim community in the UK? Mythen et al.'s (2013) research indicated that British-Pakistani youths already feel the increased scrutiny of the state, going as far as changing the way they dress and self-censoring in public in fear of being reported. Fekete (2004) warned of how the expansion of the security state in Europe after 9/11 poses a major threat to democratic freedoms for ethnic minorities, limiting the extent they can exercise their right to free speech and expression compared to their white counterparts. Now with citizenship on the line, there are concerns over institutionalising two-tiered citizenship where ethnic minorities' British citizenship is effectively less valuable and more easily removable than the majority's (Masters & Regime, 2020; Stenger, 2023).

The reproduction of this 'enemy within' discourse by state actors is significant because it shapes social meaning and what is considered 'common sense'. While CT legislation in the UK may be formulated without direct references to Islam (Prades, 2022; Mythen et al, 2013), the implementation is not neutral. These findings demonstrate how FFs have been securitised and counter-securitised through the reproduction of Orientalist identities of the Muslim Other contrasted against the civilised British, and the negative implications this has for ordinary Muslim civilians.

#### 6. Conclusion

This study contributes to the fields of securitisation and CT policymaking by investigating how foreign fighters have been securitised and exploring the impact that can have on Muslim civilians in that society. Focusing on the case of Shamima Begum in the UK, the discourse analysis of Parliamentary debates revealed two competing frames within state discourse: the 'National Security' securitisation and the 'British Democracy' counter-securitisation. While these frames compete on whether national security or the British identity as a country built on rule of law is more worth protecting, they both converge on one particular identity: that of the Oriental Other. Both frames reproduce Orientalist discourse present in the securitisation of migration and Islam in their references to Begum and other FFs. This contributes to further stigmatisation of the Muslim community as the 'enemy within' trope invites suspicion, presenting the entire Muslim community as inherently risky and susceptible to radicalisation (Mythen et al., 2013; Prades, 2022). While this study does not aim to explain why European states, the UK in particular, are so hesitant to repatriate FFs, the results help illuminate the socio-cultural contexts and identities being invoked in the current discourse, which do have an impact on policymaking. It also highlights the negative implications of these findings on ethnic minorities, particularly regarding the potential weakening of their citizenship through biased implementation of CT policies.

However, some limitations should be noted: the analysis focuses on state actors because securitisation theory predominantly views them as the most relevant securitising actors due to their position of authority (Waever, 1993). That is not to say that non-state actors do not have an impact on securitisation narratives and their success (Paterson & Karyotis, 2022), and investigating non-state discourse would be a fruitful avenue for further research. Furthermore, this paper does not discuss the gendered aspect of the case study as it was not significantly salient within this dataset. This in itself is an interesting enough omission considering Begum was the poster 'jihadi bride' in the media, an image built on tropes of violent (Muslim) women (Martini, 2018). Investigating this absence of gendered dimension, possibly through comparison to other forms of public discourse, could build on these findings to better understand how the state reacts to violent (Muslim) women.

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# Appendix 1

Threat Narrative (Securitisation)			
Category	Subcategory	Code	Description
Threat to civilised world (Martini, 2023; Kaunert & Leonard, 2019)	Corruption	С	FFs are morally corrupt, evil, and barbaric; the implication is that they are not worthy of being a part of society anymore or must be kept away, possibly implying that they will poison the rest of society (e.g.: cause more radicalisation).
	Intolerance	IT	'They will make us intolerant'. Presenting FFs presence in the polity as dangerously divisive, possibly causing a return/rise of more extremist/far right attitudes (Paterson & Karyotis, 2022)  - Distinct feature is the idea that the home society is tolerant and multiculturalist, and FFs pose a threat to this by angering the population into being less tolerant, essentially.  - E.g.: FFs will lead to increased discrimination against the 'good' Muslims in the community and therefore they must not be allowed back.
Threat to internal security (Huysmans, 2000)		IS	Discourse about how FFs are a danger to society because they will commit crimes/domestic terror acts.  - Also includes allusions to how they won't be prosecuted due to lack of evidence and therefore can roam freely in society.  Decision rule to differentiate between this category and 'traitors':  - Here the emphasis is on the danger they pose to the society rather than how they betrayed
			the nation
Threat to cultural security (Huysmans, 2000)	Integration	IN	They are presented as a threat to "cultural and political integration" (Huysmans, 2000, p. 762). Presented as an obstacle to cultural cohesion because of inability/lack of will to integrate and therefore causing unrest.
	Traitors (Stegner, 2023)	TR	FFs are citizens that are not loyal to the nation state/home society, have turned their backs on it and therefore are enemies/traitors. Often mentioning their lack of remorse or repentance at their actions.
			Decision rule to differentiate between this category and 'internal security':

			- Emphasis is on the betrayal of the FFs or their abandonment of the state by joining a terrorist group, rather than the potential crimes they may commit or how they may change society for the worse
Welfare Chauvinism (Huysmans, 2000)		WC	Typically used in relation to migrants having no legitimate right to state resources and creating an additional burden (Huysmans, 2000). Can be expanded to include discourse on FFs having no legitimate (not related to legality) right to state resources in e.g.: being repatriated  Decision rule to differentiate between this category and 'traitors':  - Focus is on how resources are better allocated elsewhere/normal citizens deserve these resources more
Agency		AG	They made the decision to leave and go to a warzone and therefore the state is not responsible to return them  - Emphasises that FFs made their choices of their own free will thereby implying the state is absolved from dealing with them  - Idea of making your bed and having to lie in it
Other	N/A		Discourse that does not belong to any of the above categories

Responsibility Narrative (Counter-Securitisation)			
Category	Subcategory	Code	Description
Victim		VI	FFs are understood as victims that have been preyed on by terrorist organisations, and so they need help from the state  - This narrative frame highlights FFs as having been duped or groomed, and may imply they lack agency in some sense (e.g.: they were mentally unstable, they were young)
Tolerance (Paterson & Karyotis, 2022; Croft, 2012)		ТО	As a tolerant/multicultural society, we must accept 'them' to stay tolerant (Paterson & Karyotis, 2022)  - Opposing exclusionary measures because they may lead to more intolerance throughout society  - Includes other references to maintaining 'our' values like rule of law, fair trials etc.  Decision rule to differentiate between this category and 'duty':  - The emphasis is more focused on the impact excluding FFs will have on wider society and their values.
International Law		IL	The state must observe their legal responsibilities/act in accordance with international norms and laws.
Responsibility	Security	S	Need to take responsibility for the FFs to safeguard domestic/international security  - E.g.: have to bring them back and find out why they went to be better prepared against recruitment efforts of terrorist groups  - References to future security threats they pose if left unattended
	Duty	DU	Foreign fighters are the home state's responsibility as our society produced them  - This narrative highlights that the state/society is at least partially responsible for foreign fighters because of the push factors that contribute to recruitment  - May also include broader references to bringing them to justice/holding them accountable so that they are not left without being punished for their crimes.  - References to moral responsibility because they came from the UK  - References to not passing the buck onto other states  Decision rule to differentiate between this category and 'tolerance':

		- Here the emphasis is on taking responsibility/accountability rather than focusing on the nation's values.
Citizenship	CZ	FFs are British citizens and therefore must be returned to Britain to be prosecuted/dealt with. Emphasis here is on their nationality and their belonging to the 'in-group' based on citizenship  - Implication is that Britons should be brought back and tried at home simply because they are British