

Framing the Pandemic and the Rise of the Digital Surveillance State

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Abstract: The pandemic caused by the SARS-COV-2 virus has provided a pretext for many countries of the world to extend executive powers, and their digital surveillance capacities in particular. Aiming to identify how different regimes frame digital surveillance, this paper employs qualitative content analysis to compare the government framing of digital surveillance in India, Israel and Singapore. Although due to their different working dynamics, one would expect democracies and autocracies to frame digital surveillance in different ways, our findings reveal an overlap between liberal and illiberal rhetoric across the cases and point to unexplored illiberal peculiarities within the category of ‘democratic backsliders.’ We conclude by cautiously speculating how heightened extents of digital surveillance and tracking may become the new normal across regime types, and how governments might exploit and recycle these same frames to justify digital surveillance after the COVID-19 crisis is over.

Keywords: Digital, surveillance, privacy, human rights, framing, regime types, democratic backsliding.

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The global pandemic caused by the SARS-COV 2 virus is changing the world in a few remarkable ways. Besides its economic toll, it has provided a pretext for many countries of the world to extend executive powers. This includes the extension of government surveillance, and particularly, digital surveillance.¹ In the light of present-day autocratization (Freedom House 2019; Lührmann – Lindberg 2019; Hartmann 2020), this calls for a scrupulous academic examination evaluating the risks inherent in the use and promotion of digital surveillance for fundamental civic rights, first and foremost, privacy (Cath et al. 2017; Raso et al. 2018).

In this article, we investigate the government rhetoric surrounding the use of digital surveillance as a widely promoted countermeasure during the COVID-19 pandemic. We do not judge or analyse whether particular measures are of a liberal or illiberal nature. Instead, we focus on liberal and illiberal ways in which governments frame and justify

digital surveillance. By drawing on rhetorics, we also seek to contribute to this special issue by providing a better understanding of whether, where, and how COVID-19 may practically blur the border between liberal and illiberal politics. Since the literature on crisis communication (Coombs 2010; Schwarz et al. 2016) suggests that talking about and responding to a crisis are intimately intertwined, our framing analysis is a step toward better understanding the future of liberalism after the COVID-19 crisis.

Although due to their different working dynamics, one would expect democracies and autocracies to frame and justify the extension of their surveillance in different manners, the literature on emergency politics as well as historical precedents, such as the rise of Nazism in the Weimar Republic (Agamben 2005), illustrates that crises can facilitate an emergence of illiberal discourses in democracies as well. Additionally, the accumulation of cases that could be labelled as “soft” or “competitive” autocracies (Levitsky – Way 2010) and debates about the coming of a new international order set to replace the liberal international order – the ideational and normative project led by the United States after the end of the Cold War (Walt 2011; Alcaro 2018; Makarychev 2020) – further complicate the expectations one may have towards how different regimes would “speak” about digital surveillance.

Whereas differences in the framing of digital surveillance might be clearer between consolidated autocracies and consolidated democracies, democratic “backsliders” and “soft” autocracies can exhibit overlaps in the ways they frame and justify digital surveillance. To test this, we ask how “soft” autocracies and democratic “backsliders” frame digital surveillance during the COVID-19 crisis and whether these different regimes do so differently.

We present an explorative analysis of three cases: Israel, India and Singapore. To answer the questions posed above, we follow framing theory and do two things. First, we investigate and compare how each of these governments talks about the “problem” – the pandemic – and the corresponding digital surveillance policy actions. To establish a benchmark for comparison, we draw from theoretical literature to define relevant liberal and illiberal rhetorical components. Second, we investigate different combinations of these elements and the frames they produce in each of our cases. In doing both, we analyse official government statements using tools of qualitative text analysis. Our findings reveal an overlap between liberal and illiberal rhetoric across cases and point to unexplored illiberal peculiarities within the category of democratic “backsliders”. We conclude by discussing the relevance of this variation within and across regime types. We then speculate about how digital surveillance may become the new normal and how governments might exploit and recycle the same frames to justify digital surveillance after the COVID-19 crisis is over.

THEORETICAL EXPOSITION: SPEAKING LIBERALLY, SPEAKING ILLIBERALLY

In defining liberal and illiberal rhetoric, which are central to our investigation, we subscribe to the position expressed by Philippe Schmitter, who pointed out that *“liberalism, either as a conception of political liberty or as a doctrine about economic policy, may have coincided with the rise of democracy. But it has never been immutably or unambiguously linked to its practice”* (1995). Based on his analysis, we believe that some of the mainstream political science literature has put too much stress on interlinkages between democracy and liberalism, arguing that liberalism is inseparable from a strong consolidated democracy (Schedler 2013; Freedom House 2014). While these claims apply to a few contemporary cases, historical precedents and the present-day accumulation of illiberal, defective democracies, or democracies “with adjectives” (Collier – Levitsky 1997; Merkel 2004) complicate this picture.

Thus, following Schmitter’s line of argument, we treat democracy and liberalism as two distinct phenomena. For the purpose of our analysis, the former represents a regime

type, rules about “*who gets what, when, how*” (Laswell 1936) or “*the formal and informal organization of the center of political power, and of its relations with the broader society*” (Fishmann 1990: 428), whereas we understand the latter as a political *Weltanschauung*, an ideology, and an overarching normative system of values and beliefs about how society and government *ought to be* organised, rather than an objective representation of it (Stråth 2013). Thus, by aiming to locate and compare liberal and illiberal framing justifying digital surveillance, we take interest in the deeper normative visions of the regimes under our scrutiny, and their ideas about the underlying relationship between individuals, society and government, which are exposed by the corona crisis and locatable in their crisis communication. This follows from the lessons that students of international crisis communication are well aware of. The way in which political regimes, like other organizations, perceive and practise crisis communication, the way they “co-create” the meaning of crisis, is intimately contingent on values. In our case, liberal and illiberal values shape the regime’s perception, communication, and behaviour in the face of a crisis (Schwarz et al. 2016: 3; Coombs 2010: 19).

Liberalism has meant different things to different scholarly fields at different historical junctures. As argued by Michael Freeden and Marc Stears, it is thus “*not a single phenomenon, but an assembly of family resemblances, with a rich and complex historical story and with numerous contrasting contemporary formations*” (2013: 330). For instance, to economists, liberalism refers to the school of thought that crystallized in the 19th century around the works of Adam Smith (1776), which were broadly centred around individual freedom to participate in a competitive market economy. Various scholars have later turned Smith’s legacy into different economic sub-doctrines (see von Mises 1912; Hayek 1944; Friedman 1962). For scholars of international relations, liberalism refers to both a theory explaining international relations, and a world order in which economic interdependence gave rise to political interdependence and the creation of multilateral organizations to govern the international sphere (Keohane – Nye 1989; Moravcsik 1997).

Here we focus primarily on political liberalism with roots in the works of political theorists like John Locke, John Stuart Mill, and John Rawls. These thinkers stressed individual rights to act as political subjects rather than objects, and called for respect of civic and human rights. Based on their work, despite different meanings that liberalism had for different scholars across various academic fields, at least three common denominators of liberalism and liberal rhetoric can be identified. First, liberalism is a socio-economic and political ideology that is centred on individualism; that is, that the individual, and her freedom, welfare, wellbeing, and interests are the normative reference points of all political and social organization (Mill 1859).² As formulated by Mill, “free development of individuality” should be prioritized, since human growth is primarily facilitated by the exercise of natural individual mental and moral capacities. Second, liberalism stresses the importance of civic rights and freedoms, including freedom of expression and freedom of participation in collective decision making (Berlin 1979). Going all the way back to John Locke, liberal thinkers have tied the legitimacy of the government with the consent of the people and considered individual civic and human rights to be derived from the natural state, where equality between individuals has been assumed to prevail (Locke 1947 [1689]). In a similar vein, for John Rawls, liberalism is conceived as an *ethical* theory which prioritizes the interests of individuals as autonomous, rational and purposive agents capable of collectively seeking the common good rather than solely striving for the fulfilment of particularistic personal interests (2005). Finally, in the liberal vernacular governments and states are both necessary and – if left unchecked – perilous. They have to protect the socio-political and economic order to secure individualism, the free market, and freedoms; at the same time, the role of the state needs to be balanced and constrained so as not to infringe on these same individual rights (Paine 1776; Rawls 2005).

The aforementioned values are of an overlapping and sometimes of a contradictory nature; they also vary regionally and in their classic and modern liberal interpretations (Börzel – Zürn 2020). Moreover, all of them, individually and collectively, have suffered many attacks and false intellectual appropriations (Freeden – Stears 2013: 330). However, it is largely agreed that these contested values in the multiplicity of their interpretation form the core of the liberal *Weltanschauung*, and thus should be detectable in any form of contemporary liberal rhetoric.

Following the aforementioned discussion, in this paper, we expect liberal rhetorical elements to be *those which stress the perpetuation or protection of individual civic rights and liberties, stress the right of individuals to question, participate in, or influence government policy, and emphasize the inclusion of different individuals regardless of ethnic, linguistic, religious, or other differences.*

Illiberalism and the tradition of illiberal rhetoric, on the other hand, can be traced all the way back to *The Prince*, a classical 16th century political treatise by Niccolò Machiavelli, a diplomat and statesman of the Florentine Republic under Medici rule. Machiavelli is known for describing political power as the end goal of politics and propagating an “all means necessary” approach for maintaining it (2008 [1532]). Arguing along similar lines, the works of Carl Schmitt, probably one of the most prominent critics of liberalism, are by far the most informative about characteristics of illiberal rhetoric. Previously used to justify political reforms in Nazi Germany, they are temporarily utilized by populist and undemocratic political actors around the world.

One of the main tenets of Schmitt’s thought is that politics are defined by an ontological friend-enemy distinction. Enemies are never individuals but are collective, and thus Schmitt criticized liberalism for overlooking the inherent inequality of politics, arguing that friends cannot be treated equally to enemies (1932). Schmitt formulated a theory of plebiscitary authoritarianism in which political order is assured by a connection between a sovereign leader and a united people, relying on an almost mystical bond between the two (Lewis 2020). Therefore, once entrusted with power by the people, Schmitt’s leader does not seek to consult or deliberate, but rules at his own discretion.

Arguing against individualism and pluralist freedom of opinion, Carl Schmitt propagated a “moral hegemony of the majority” (Lewis 2020). Contrary to liberal deliberation, Schmitt’s “*sovereign is he who decides on the exceptional case*” (Schmitt 1922). Ascribing this freedom of political choice to a sovereign, Schmitt’s political theory is profoundly anti-universalist and anti-cosmopolitan, as he stands against the “spacelessness” which he asserts to be the essential feature of the liberal order (Lewis 2020). The same conflict also plays out today on global and domestic stages, where liberal internationalists clash with illiberal nationalist and populist political forces, which is exemplified by the contentious relations between the European Union and populist far-right political parties, and between transnational institutions and strongman political leaders like Xi Jinping, Vladimir Putin or Viktor Orbán.

Based on the aforementioned traits of illiberalism, for our inquiry we expect illiberal rhetorical elements to be *those which stress conflict, define collective enemies, support a normative hegemony of the majority, emphasize the decision-making sovereignty of a leader or a small clique over deliberation and participation, and perpetuate an anti-universalist and anti-internationalist rhetoric.*

FRAMING THE PANDEMIC AND DIGITAL SURVEILLANCE

Used in studies of agenda-setting, social movements, and public policy, the concept of framing has aimed to give us a better understanding of how, when faced with uncertainty, different actors will seize on different elements and linkages to construct diverging views of reality (Rein – Schon 2013). In the words of Anthony Zito, much emphasis has been

put on “how people key on specific elements of an event to understand what is going on and how they should behave” (2011: 3).

According to Martin Rein and Donald Schon, the first step in framing involves a *policy debate* in which different policy contestants seek to prevail with their policy story frames, including rhetorical persuasion, evidence, and symbols. In the second step come *action frames*, which are focused around the debate over policy practice in which actors argue and develop policy stories that influence the creation of procedures and policy instruments (1993). Similarly, scholars studying social movements provide a tripartite typology. First comes the *diagnostic* framing of current events, which seeks to discredit the prevailing framing and offer a new interpretation. Second, *prognostic* framing involves the rhetorical construction of a solution to the problem. Finally, *motivational* framing focuses on the conceptualization that triggers people to join the social movement (Snow – Benford 1988).

Looking at these different strands of literature, we identify two consistent stages of framing: one component diagnoses the situation (*diagnostic frames*), and the other describes the treatment recommendation (*action frames*). As Robert Entman summarizes, it “involves selection and salience. To frame is to select some aspects of a perceived reality and make them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation for the item described” (1993: 52). In turn, we further focus on policy story/diagnostic and policy action/prognostic subframes, which can be combined to “speak” to citizen audiences about the nature of COVID-19 as a problem, and digital surveillance as a corresponding policy prescription. In our analysis, we firstly aim to provide an answer to the *how* question and locate and explicate how diagnostic and prognostic subframes materialize empirically. In the second step, following the tenets of framing theory, we explore different combinations of these elements and the frames they produce in each of our cases.

Building on previously provided characterizations of liberal and illiberal rhetoric and recent literature, we discern seven pairs of liberal and illiberal rhetorical components as theoretically mutually exclusive dichotomies (see Table 1).

We expect to detect these elements while analyzing statements of different political regimes when they justify the use of digital surveillance in the face of COVID-19. First, concerning the policy story of the public health threat itself, we expect liberal framing to be inclusive, and to portray the virus as an indiscriminate threat along the lines of the United Nations Development Program (1994), stress universal individual rights to health, and thus not make any distinctions based on social identities. In contrast, illiberal framing should portray the pandemic as especially threatening to a particular national, ethnic, or religious majority, or any other identity-based majority. As explicated by Mehmet Efe Caman’s study on the framing of human rights violations in Turkey, the majority can be loosely defined by othering and singling out of any group opposing the regime’s policy story and by portraying it as a threat to the majority (2019).

As students of decision-making and international relations may expect, illiberal framing should also engage in blame-shifting by portraying regional and international relations and interdependencies, rather than environmental, biological or governance factors, as the root causes behind the pandemic (Hood 2002; Bartling – Fischbacher 2012; Heinkelmann-Wild – Zangl 2019). It can even formulate demands for retribution, mobilizing nationalistic discourse and seeking for a “rally round the flag” effect, as exemplified by Amanda Woode’s research on framing of the electricity crisis in Central Asia (2014). In contrast, liberal framing of the pandemic should embrace aspects of international interdependence at the origins of the crisis, portray it as an issue of international governance, and call for heightened international cooperation, whether bilateral, multilateral or facilitated by international organizations (Keohane – Nye 1989; Moravcsik 1997; Barnett –

Table 1
Pandemic Subframes

Policy story/diagnostic subframes (What sort of a problem is COVID-19? Whom does it endanger?)		Action/prognostic subframes (How is digital surveillance justified? What sort of a measure is it?)	
Liberal	Illiberal	Liberal	Illiberal
Indiscriminate threat (UNDP 1994)	Othering/exclusive majoritarianism (Schmitt 1922; Caman 2019)	Deliberation and participation (Locke 1947 [1689]; Mill 1859; Berlin 1979; Rawls 2005)	Sovereign regime action (Schmitt 1922; Makarychev 2020)
International interdependence (Keohane – Nye 1989; Moravcsik 1997; Ikenberry 2009; Alcaro 2018)	International blame-shifting (Hood 2002; Bartling – Fischbacher 2012; Woode 2014; Heinkelmann-Wild – Zangl 2019)	Individual freedoms and rights (privacy) (Locke 1947 [1689]; Mill 1859; UDHR 1948; ICCPR 1966)	Pandemic response over individual freedoms (Schmitt 1992)
The pandemic falls within “normal” politics	A securitized pandemic (Wæver 2012; Balzacq 2010; Watson 2012)	International/regional endorsement (Finnemore – Sikkink 1998; Barnett – Finnemore 1999; Alcaro 2018)	Inspired by authoritarian gravity centres (Kneueur and Demmelhuber 2016)
		Admits criticism (Börzel – Zürn 2020)	Delegitimizing critics (Lewis et al. 2018; Caman 2019)

Finnemore 1999; Ikenberry 2009). In the words of Riccardo Alcaro, liberal speakers should acknowledge that “*states are members of an international society rather than isolated units*” (2018) and that this creates mutual responsibilities in the face of the pandemic to further engage with other players of the international system rather than self-isolate.

Whereas it is not always illiberal to speak about or diagnose a situation as a security threat, diagnosing a public health issue – in this case, the COVID-19 pandemic – as a security threat, to our reading, is an instance of illiberal rhetoric. Following Scott Watson (2012), we believe that securitization and framing are substantively similar research programmes. We thus expect that diagnosing the pandemic as a security threat may lead to an illiberal framing of digital surveillance measures. The literature on securitization suggests that by securitizing an issue, and constructing it as a security threat, decision makers are able to envision “extraordinary” measures (Wéver 1993).

Metaphors, images, and emotions are contextually and purposefully mobilized by political actors to prompt sensations and intuitions on the part of an audience towards a particular event, individual, or group with a view of awakening an “aura of unprecedented threatening complexion” around it, implicating that an unprecedented political act is needed to block its development (Balzacq 2009: 63). The literature on the matter has compiled an impressive number of case and comparative studies on the global war on terror, migration, minority groups and other topics, illustrating how securitization leads to policy measures clashing with liberal ideals of individual autonomy, civic and human

rights, the idea of deliberation and the political consent of the people (see for instance Balzacq 2010; Donnelly 2013; van Baar et al. 2019).

In contrast to securitization, we envision a “de-securitized” diagnosis of the pandemic on the liberal side of the nexus. We use it to test if such a subframe that presents COVID-19 as something that should not derail “politics as usual” and stresses the organization of the “normal” political cycle, appears at all and whether it actually stands in contrast with attempts to securitize the pandemic.

Concerning action subframes, we expect governments to talk about digital surveillance differently as well. Liberal subframes will focus on deliberation and participation aspects in introducing surveillance measures (Mill 1859; Berlin 1979). Among individual freedoms and rights, privacy will be highlighted and, in the light of international human rights instruments (UDHR 1948; ICCPR 1966), liberal framing will stress the proportionate and non-transgressive nature of the digital surveillance measures applied. It will also frame it as corresponding to prescriptions of international liberal institutions like the World Health Organization and good practices of regional groupings (Finnemore – Sikkink 1998; Barnett – Finnemore 1999; Alcaro 2018). Finally, liberal subframes admit and engage with the criticism voiced towards digital surveillance, since, as Tanja Börzel and Michael Zürn argue, criticism from the “inside,” enabled by the guarantee of the freedoms of thought and speech, constitutes an integral part of – what they define as – the liberal script (2020).

On the other end, illiberal subframes ought to justify digital surveillance by sovereign privileges of the government to act swiftly according to its judgment, and contrast it with the indecisiveness of liberal deliberation (Schmitt 1922). Unlike liberal framing, they should oppose prescriptions stemming from the international community and speak about the COVID-19 response measures as a matter of the regime’s “illiberal freedom of choice” (Makarychev 2020). This also implies that the illiberal pandemic framing should prioritize the pandemic response over any individual rights. Illiberal subframes can identify digital surveillance as an international practice worth imitating, but are more likely to refer to digital surveillance cases in so-called illiberal authoritarian “gravity centres,” illiberal capitalist autocracies facilitating the diffusion of illiberal norms and practices in their respective regions (Kneueur – Demmelhuber 2016). Finally, following Carl Schmitt, we expect illiberal framing to seek for a hegemony of ideas and values and thus not tolerate opponents of digital surveillance, but aim to delegitimize them by discursively marginalizing critics by portraying them as the internal “fifth column” that is antagonistic to the interests of the state (Lewis et al. 2018).

Table 1 and the discussion above map our theoretically-informed understanding of how liberal and illiberal rhetoric surrounding digital surveillance *may* sound in the face of the corona crisis. After the presentation of our case selection and methodological approach, we test to what extent these frames are relevant in individual cases and explicate where and how liberal and illiberal subframes complement one another to form complete liberal, illiberal, and mixed frames.³

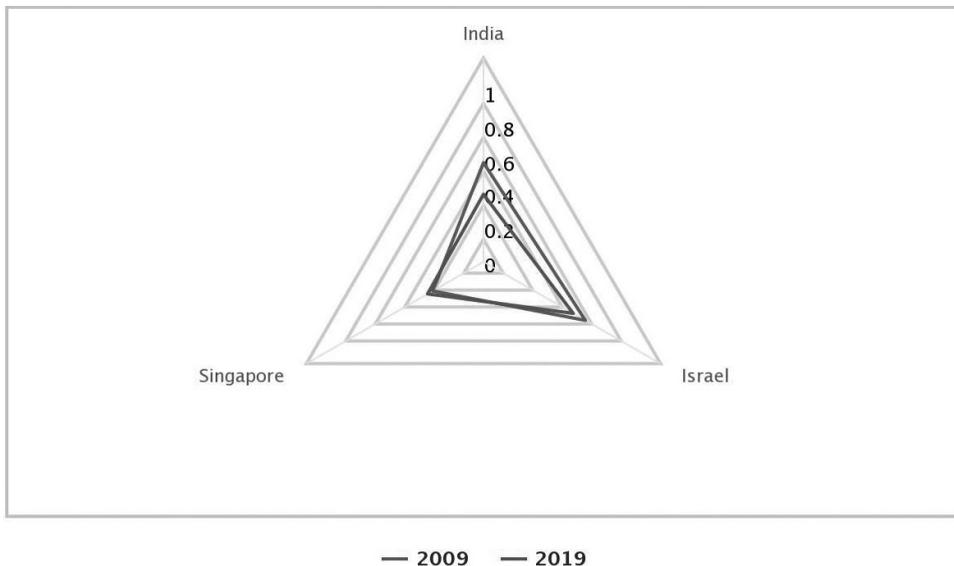
CASE SELECTION: THREE OF A KIND

Despite their many differences, Israel, India, and Singapore share remarkable features, but differ in their political regimes. All of our cases have been similarly hit by the SARS-COV-2 virus and have employed similar digital surveillance measures to respond to it. They have all been using and developing various digital tools before the pandemic and they all enjoy very diverse societies.⁴ On the other hand, Singapore differs from the other two in its regime type – authoritarianism.

Israel and India are both democratic “backsliders” but at different stages. Singapore is a dominant party autocracy which, despite allowing for a level of political pluralism, does not achieve the procedural minimum of democracy (Dahl 1973). Various indices testify to this. Freedom House’s “Freedom in the World” report (2020) categorizes both

India and Israel as free countries. Nevertheless, Israel enjoys more civil liberties than India and scores five points higher than India in the general freedom score (76 and 71 out of 100, respectively). More importantly, both countries witnessed different paces of freedom regression during the last years. In 2017, India scored 77 points out of 100 in the Freedom House report; Israel scored 80. Despite the recent erosion of democratic institutions and practices in India and Israel, there seems to be enough evidence to suggest that Israel and India did not yet transition to authoritarianism and can be positioned on the opposite side to that of Singapore on the regime nexus. The starker backsliding of democracy in India is even more evident when seen in a longitudinal light. “Varieties of Democracy” data show that between 2009 and 2019, India has substantially regressed on the index of “liberal democracy.” Israel has experienced a milder regression on the same index (see Chart 1).

Chart 1
Liberal Democracy Index: India, Singapore and Israel in 2009–2019



Highcharts.com | V-Dem data version 10.0

Source: Variable Radar Chart, v-dem.net/en/analysis/Radar2Graph.

India, Israel and Singapore have all been using and developing various forms of surveillance before the COVID-19 pandemic. Two of our cases, Singapore and Israel, are among the 30 most ICT-developed countries in the world, whereas India comes in at number 133 (ITU 2017). The level of ICT development does not necessarily indicate the level to which our cases had used digital surveillance before the COVID-19 pandemic. Whereas the pandemic as a public health issue provoked a fast and more visible employment of digital surveillance, the scarcity of reliable data on the usage of digital surveillance prior to the COVID-19 pandemic makes it hard to make a sober assessment of the extent of its previous employment. However, existing evidence suggests that all three countries have used similar types of digital surveillance technology in the past (Carnegie Endowment 2019).

In the face of the corona virus, two similarities between the cases are crucial in our case selection. First, they have all been comparably hit by the pandemic. Despite the differences our cases manifest in their infection and death rates per one million population,

they were all places where the pandemic hit strongly, affecting every aspect of normal life and provoking various responses from their governments. Israel was one of the early-hit countries with the first major spike in cases taking place on the 25th of March 2020. After an initial decrease in the number of newly diagnosed patients starting in the second week of April 2020, the pandemic started taking hold there again at the end of May (World Health Organization 2020a). In Singapore, the first major spike in the number of newly infected patients was on the 17th of April 2020. Despite the fact that the number of newly reported cases started to decline in the second half of May, Singapore has one of the highest infection rates per one million population (World Health Organization 2020b). India, on the other hand, has been, comparatively speaking, a late-comer. Reported cases there have continued to consistently rise since May 2020. By June 17th, the total number of positive cases was more than 350 thousand with no indication of an imminent decrease in the rate of infection (World Health Organization 2020c). In addition to that, all of our cases chose to impose lockdown measures to fight the spread of the SARS-COV-2 virus.

Second, all of our cases employed techniques of digital surveillance to combat the spread of the disease. All of them have developed and used contact-tracing applications and quarantine enforcement digital surveillance. India and Israel recycled anti-terrorism and war surveillance measures to enhance contact tracing and quarantine enforcement. Israel has re-purposed its half secret Shin Bet surveillance programme, which uses GPS and mobile phone tracking, to monitor whether individuals who received a quarantine order are following it. The programme was originally only legally employable in cases of countering imminent terrorist threats. Prime Minister Benjamin Netanyahu initially issued an emergency order that allows the usage of the Shin Bet surveillance to track coronavirus active cases as well as their past movements for 30 days (Halbfinger – Kershner – Bergman 2020). These 30 days were extended to 60 days by the cabinet (Privacy International 2020b). On the 19th of March 2020 attempts by civil society actors motivated the supreme court on to threaten the ban of such re-purposed usage of the programme unless a due regulatory process took place by the 24th of March within the Knesset (Privacy International 2020a). Under the same conditions, it banned the police usage of cell phone locations to track coronavirus patients and those who are ordered to quarantine. These constraints were soon lifted, however, when the parliament re-opened to start the process of legislation (Winer – Staff 2020). The Shin Bet system uses GPS location, credit card purchase data, and more to locate people who came in contact with positive cases within two meters for more than ten minutes and orders them to self-isolate (Gross 2020). The location data of quarantine violators is also shared with police authorities. In addition to the Shin Bet surveillance programme, Israel launched the corona tracing mobile application HaMagen to enhance contact tracing and the tracing of the spread of the pandemic. Unlike the Shin Bet surveillance, HaMagen saves the user's GPS locations locally on their mobile phone. Once tested positive, the user has to upload this history to a central server of the Ministry of Health. The ministry updates this information for all such users, and those who came in contact with the positive case during the last 14 days are notified (Ministry of Health 2020a).

Singapore has used a wide range of digital surveillance methods to combat the spread of the pandemic. To enforce quarantine orders, Singapore employed the Stay-Home-Notice Reporting System, which legally binds people who are ordered to quarantine to share their location with the Ministry of Manpower. The system requires users to upload photographic proof to make sure that they are at the same place as their digital device (Privacy International 2020c). To facilitate contact-tracing, shopping malls and other businesses were required to use the programme Safe-Entry, which uses QR codes to log the names, NRICs, and mobile numbers of individuals who enter high-traffic places or business buildings. Individuals can be denied entry into these places if they refuse to scan the QR code and provide their information. To track symptomatic individuals and prevent them

from entering public places, an artificial intelligence-equipped temperature screening system called VigilantGantry simultaneously screens real-time temperatures of multiple individuals (Yang 2020). The automated thermometer can be augmented with facial recognition software in order to personally identify symptomatic individuals (Yang 2020). Finally, to enhance contact-tracing, Singapore has developed the Trace-Together application. The application uses Bluetooth technology on digital devices to continuously record users' close contacts. The data is collected in an anonymous form and saved locally on the user's device (Singapore Government Agency 2020a). If a user tests positive, he or she will be asked to provide their recorded contact data to the Ministry of Health, which will, in turn, notify the users who came in close contact with the positive case and order them to quarantine (Privacy International 2020c).

In India, digital surveillance responses to the pandemic have been numerous and much more decentralized than those in Singapore and Israel. This is not surprising given its decentralized federal system. The only digital surveillance method employed federally there is the contact-tracing application Aarogya Setu. Similarly to the application used in Singapore, the application uses Bluetooth to record contacts, stores data locally, and uses data of positive cases to trace their contacts (Government of India 2020a, 2020b). On the state and union levels, digital surveillance responses have aimed at enforcing quarantine, controlling the movement of positive cases, and tracing their contacts. This has been done in three different ways: the first is by utilizing command and control centres in smart cities. These command and control "war rooms" are equipped, depending on the smart city, with a combination of CCTV, face recognition software, and GPS tracking. The second is by using local contact-tracing applications which work similarly to the federal one. The third is by using mobile tower signals provided by ISPs and GPS locations to control individuals who are ordered to quarantine (Privacy International 2020e).

These similarities allow us to test for the impact of the political regime on the way in which our cases frame their digital surveillance responses to the pandemic. We test how they compare to each other in their framing and identify points of difference and overlap.

THE METHOD AND MATERIALS OF THE ANALYSIS

In the light of the explorative nature of our research, we situate our methodological approach at the intersection of directed qualitative content analysis (Mayring 2004; Hsieh – Shannon 2005) and grounded theory (Glaser – Strauss 1967; Strauss – Corbin 1998). This means that we combine our matrix of deductively derived pandemic subframes with inductive insights derived from the data.

Initially, for each case over 800 text units published in the period from the 1st of March to the 17th of June 2020 were screened. We analysed statements of government officials with a special focus on the speeches and press releases of the heads of state, governments and health ministers. In addition, we analysed texts found on official government websites and contact-tracing-applications' websites, and press releases by relevant ministries. Moreover, official government and national newspapers were also screened for identification of relevant government statements. We located 24 relevant documents for Singapore, 11 for Israel and 46 for India.

All our data was originally found in the English language. In India, English is one of the official languages; all the Indian governmental websites known to us are available at least in the English, Urdu, and Hindi languages. Similarly, in Singapore English is one of the official languages; the official government website is available only in the English language. All of the Singaporean ministerial speeches are available in English, Tamil, Mandarin, and Malay. The original languages of the speeches tend to alternate from one event to another. In Israel, despite the fact that English is not an official language, the government's official communication is available in various languages, including English,

the accuracy of which we checked by comparing the collected documents with their equivalents released in Arabic, one of the officially used languages of the state of Israel.

We used MAXQDA 2018 software to code segments in these documents three times and checked for inter-coder agreement two times.⁵ When we assessed the extent to which our cases differently employ the subframes, we treated each document as one unit of analysis. That means that we considered the mere existence (or lack thereof) of each code within each single document. We do not quantitatively examine the number of times a code is mentioned in a single document, or the length of the coded segments. Instead, we focus on complementing our thick qualitative description with a descriptive quantification of the number of times a single code appears in a respective case. In a second step, with a view of identifying emerging frames, we explored diagnostic and prognostic rhetorical elements co-appearing at the document level.

DIAGNOSING: WHAT SORT OF A PROBLEM IS THE PANDEMIC?

Concerning diagnostic rhetorical components, the Israeli, Indian and Singaporean governments all diagnosed the coronavirus as an indiscriminate threat and elaborated on the fact that it calls for an embrace of international interdependence rather than self-isolation. We detected an illiberal securitization of the pandemic in all three cases, but it was by far the most pronounced in the case of the democratic “backslider” India.

Interestingly, in the general atmosphere of global turmoil, our cases do not attempt to shift the blame for the pandemic to other countries, for instance China, where the coronavirus presumably originated. Moreover, there were no attempts to engage in “othering” by explicitly excluding a particular identity-based group from the national COVID-19 response efforts. The Singaporean and Indian ministers of health only implicitly discussed heightened infection risks for migrant workers (Singapore Government Agency 2020e; Ministry of Health and Family Welfare 2020j). This was, however, clearly counterweighted by numerous communications by government officials from both countries, framing COVID-19 as an indiscriminate threat to the “well-being of every Indian” and “Singaporeans from all walks of life” (Singapore Government Agency 2020e; Ministry of Electronics & IT 2020a). As a vivid example of liberal diagnostic framing of the pandemic, the Singaporean Ministry of Health has explicitly declared its determination to centre its response efforts around migrant workers rather than single them out: *“While the community cases are coming under control, we have seen a rise in migrant worker cases, particularly in the dormitories. We moved in quickly, set up medical posts in all the purpose built dormitories [...] We are making progress, and will continue to do our best to care for our migrant workers”* (2020c).

Even in the case of Israel, known for the contentious relations between its Muslim citizens and Jewish-dominated government, the framing of the pandemic has been explicitly inclusive. In a joint statement with the general directors of the ministries of health and finance, Prime Minister Benjamin Netanyahu directly addressed Israeli Muslims: *“Ramadan is almost upon us. Just as the Jewish citizens of Israel acted during Passover, I now request that you have the Ramadan meals only with your nuclear family. I ask you to preserve the whole and thus take care of yourselves and your loved ones”* (Prime Minister’s Office 2020b). Finally, in all three cases the framing of the pandemic as an indiscriminate threat was substantiated by multi-lingual government communication addressing every major linguistic group in the respective countries.

Likewise, all of our cases are similar in that they all embraced the pandemic as a shared global challenge. This was well illustrated by Singaporean and Indian officials highlighting national inputs into the global efforts to develop a vaccine led by the World Health Organization (Singapore Government Agency 2020e; Ministry of Science & Technology 2020a). In addition, the leaders of Singapore and Israel have both presented their COVID-19 counter-measures as coordinated with the relevant regional groupings,

namely with ASEAN and the European countries respectively (Prime Minister's Office Singapore 2020a; Prime Minister's Office 2020k), rather than as domestic achievements.

The most obvious difference between Israel, India and Singapore in terms of diagnosing the pandemic is the degree to which it has been securitized. Singapore makes implicit references to COVID-19 as a security type of a threat (Singapore Government Agency 2020e; Ministry of Health 2020c). Similarly, Prime Minister of Israel Benjamin Netanyahu has referred to a "war on corona" and "fighters in the campaign against Corona" in a couple of instances (Prime Minister's Office 2020c). The India government, on the other hand, has been unequalled in the frequency and intensity of its framing of the pandemic as a security concern. In more than every fourth unit of analysis in this case, we identified instances of this frame. The press releases by the Indian government and speeches of Prime Minister Narendra Modi were very colourful in their militant language, describing integrated "COVID-19 war rooms," labelling essential workers – doctors and nurses, sanitation workers and the police force – "corona warriors," and calling the government to work on "war-footing" (Ministry of Housing & Urban Affairs 2020g; Ministry of Health and Family Welfare 2020b; Prime Minister's Office 2020d).

The securitization of the pandemic by the Indian government contrasts with the case of Singapore, where the only instance of framing the pandemic in the broader framework of "normal" politics was identified. In an intervention at the ASEAN Summit, Prime Minister Lee Hsien Loong noted: "*We should also not lose sight of the work that is in progress. Therefore, I propose ASEAN should still aim to sign the RCEP this year and should also continue pursuing the Comprehensive Air Transport Agreement with the European Union. Dealing with the immediate crises, while not losing sight of the longer term objectives is the best way to enable our economies to survive this crisis, and to bounce back after COVID-19 passes*" (Prime Minister's Office Singapore 2020a). Though this remains the only empirical example of "de-securitized" framing of the pandemic, Loong's intervention complements Singapore's policy-action liberal components and explicates how autocracies can be well-versed in using the liberal "tongue."

In sum, the qualitative mapping of the liberal and illiberal framing employed by the Israeli, Singaporean and Indian governments illustrates how when standing on different sides of the regime demarcation line, "backsliding" democracies such as India and Israel can employ illiberal rhetorical elements, whereas stable autocracies can define crises such as COVID-19 in liberal ways. A brief look at the frequencies of the liberal and illiberal diagnostic codes also supports such a proposition (see the electronic annex to the publication).

TREATING: RESPONDING WITH DIGITAL SURVEILLANCE

The following paragraphs explicate our finding that all of our cases use a combination of liberal and illiberal subframes while talking about digital surveillance. They do, however, differ in regard to the following. First, not all the subframes are employed (equally) across our cases. Second, our cases differ in how they combine liberal and illiberal rhetorical components. Third, our three cases differ in the way they talk about contact-tracing applications.

Unlike India, both Israel and Singapore make significant effort to frame their contact-tracing applications as being compatible with individual rights and freedoms, including the freedom of choice and privacy rights.⁶ In Israel, the official website of the HaMagen application mentions several times that the information remains on the users' phones and highlights elsewhere that the Ministry of Health's data "*is updated and sent to [the user's] device one way*" (Ministry of Health 2020b). Similarly, in Singapore, the Govtech website assures users that "*given the [TraceTogether] security and privacy safeguards*", their data, including their mobile phone numbers, "*remain secret*" and that "*there is no way for the government to locate [the users'] whereabouts with this app*" (GovTech Singapore 2020a).

In India, less effort is put into such framing of its Aarogya Setu app; in the 42 coding instances in India only two very brief references to such framing appear – compared to seven such references in the 44 coding instances in Singapore and two in the 19 coding instances in Israel.

All three countries encourage the willing participation of their citizens in digital surveillance measures, particularly by encouraging them to use contact-tracing apps.⁷ However, whereas Singapore and Israel frame their applications as having been developed in a deliberative and participatory manner, India does not. For instance, Israel frames its HaMagen contact-tracing application as an open-source application which is developed “*on the values of communal responsibility*” and allows “*programmers in Israel and around the world to help and support this effort*” (Ministry of Health 2020a). In Singapore, the government consistently refers to TraceTogether as a “community driven” effort (Smart Nation and Digital Government Office 2020; GovTech Singapore 2020g). In India, the government frames Aarogya Setu as a successful effort of the Indian government: “[The] Prime Minister observed that the States where [the] Aarogya Setu app has been downloaded in large numbers are witnessing positive results. Efforts should be made to increase the reach of the app, he said” (Prime Minister’s Office 2020j).⁸

India enjoys two peculiarities. First, the way in which the government encourages citizens to use contact-tracing apps proved qualitatively different than the corresponding measures in Singapore and Israel. We inductively created a subframe called “indirect encouragement” to capture this nuance. In Singapore and Israel, the government talks directly to citizens, encouraging them to participate in the contact-tracing because the fight against COVID-19 “*requires all of us [Israelis] to join the effort*” (Ministry of Health 2020c) or requires the people (in this case, Singaporeans) to “*support one another to live life normally and safely*” (Singapore Government Agency 2020a). In India, on the other hand, the central government often indirectly states that the local states “*have been asked to advise individuals to install the Aarogya Setu*” (Ministry of Home Affairs 2020b). These indirect and sometimes patronizing instances of encouragement might reflect the peculiarities of the decentralized Indian political system.

Second, India employs an *illiberal “othering”* of its contact-tracing applications that is aimed against specific groups of people. As a result of its political system, India has used not only its national contact-tracing app, but also sub-national contact tracing apps, many of which sync their information with the national Aarogya Setu. It illiberally frames national and sub-national apps’ usage in containment zones and against travellers and returnees.⁹ For instance, the central government in India celebrates that Surat Smart City forces recent travellers to it to fill in a health-status questionnaire on its tracker app twice a day; the user has to also send a selfie (Ministry of Home Affairs 2020a). In the same manner, the central government directs local governments to enforce a “*100% coverage of [the] Aarogya Setu app among the residents of the Containment Zone*” (Ministry of Home Affairs 2020b). This “othering” in its rhetoric surrounding contact-tracing apps sets India aside from Singapore and Israel.

Similarly, Singapore enjoys two peculiarities. The first is that it stands out in its emphasis on the international and regional support behind its contact-tracing app.¹⁰ This is not surprising; in fact, Singapore has relied and worked for decades on constructing its image as one of the world’s leaders in advanced digital infrastructure (Chang 2003: 97). This image resonates well with international organizations as they continuously praise Singapore for utilizing digital tools in promptly responding to the pandemic (UNDP 2020). The second is that it is the only one of our three cases that does not make a single reference to the necessity to compromise on freedoms because of the pandemic.

Besides contact-tracing apps, all other digital surveillance measures in Israel, Singapore, and India are framed in an overly illiberal fashion. In Israel, the Shin Bet surveillance is framed as a sovereign decision by the government that will identify

people who need to quarantine and will be “*enforced without compromise*” (Prime Minister’s Office 2020b). The government justifies this on the grounds of the emergency situation of the pandemic that necessitates a calculated compromise on individual rights and freedoms. In Singapore, SafeEntry and the Stay-Home Notice are framed as necessary measures taken and enforced by the government, the instructions of which are communicated to the citizens in a form close to orders: “*All persons under SHN must remain in their place of residence at all times. They will be subject to close monitoring of their whereabouts, through electronic monitoring as well as physical spot-checks. Strict enforcement action will be taken against those who breach the requirements of the SHN*” (Singapore Government Agency 2020h). In India, whereas most policy-action subframes – including illiberal subframes – revolve around contact-tracing applications, some occasional, more general references to evoking the Disaster Management Act and to using “*technology to conduct surveillance on people*” are employed.¹¹

In all three cases, contact-tracing apps are the subject of most liberal subframes. However, India – the world’s biggest democracy – employs liberal subframes minimally compared to Israel and Singapore.¹² At the same time, our two democracies employ illiberal policy action subframes more than Singapore; the most extensive employment of illiberal policy action subframes is found in India.¹³

EMERGING FRAMES: MIXING LIBERAL AND ILLIBERAL

In a second step, we followed framing theory and identified patterns of co-appearance between diagnostic and prognostic rhetorical elements in the same document, which form comprehensive frames of their own. In all three cases, different combinations of liberal and illiberal subframes appear, forming mixed frames that blur the line between liberal and illiberal framing. Mixed frames occur more in Singapore than in India or Israel. In the case of India, 2 mixed frames appear out of 139 coding instances. One frame combines the diagnostic liberal subframe international interdependence and the illiberal prognostic subframe sovereign government action. The other combines the illiberal diagnostic rhetorical element of securitization and the liberal prognostic rhetoric of deliberation. In the case of Israel, 1 instance of mixed framing occurs among 44 coding instances. The mixed frame combines the diagnostic subframes securitization and deliberation. In the case of Singapore, 4 mixed frames occur among 99 coding instances. One of these mixed frames combines the diagnostic rhetorical element of indiscriminate threat with the prognostic illiberal subframe of sovereign government action. As for the other three, the mixed frame “*securitization-deliberation*” occurs 2 times and the “*othering-deliberation*” frame once.

While Israel and India employ more illiberal frames than Singapore, Singapore employs more liberal frames than India and Israel. In the case of Israel, 1 illiberal frame occurred in 44 coding instances. In the case of India, 2 instances of illiberal framing occurred in 139 coding instances. In comparison, Singapore does not employ illiberal frames; not a single illiberal frame occurs in the 99 coding instances in this case. On the other hand, Singapore employs 14 liberal frames in its 99 coding instances, whereas the corresponding figures for Israel and India are 2 in 44 and 6 in 139, respectively.

All the illiberal frames employed by Israel and India are “*securitization – sovereign government action*” frames. For instance, in one press release, the government of India sketches various local employments of “*war rooms*” to contain the pandemic. One of these war rooms – the one in Bengaluru and Tumakuru – uses technologies to “*surveil on [sic] people within [an] 8-km radius of a confirmed patient*” (Ministry of Housing & Urban Affairs 2020g). In his remarks in the joint statement with the Health Ministry (Prime Minister’s Office 2020c), Israeli Prime Minister Benjamin Netanyahu also announced various extra measures to be taken as part of the “*war on corona*.” He justified the use of “*digital means*” to “*locate and quarantine Corona patients*” as part of the related joint efforts of various ministries, including the Defence Ministry.

Singapore not only employs liberal frames more frequently, but also engages a wider range of liberal frames compared to India and Israel. At the same time, Israel uses the lowest number of different liberal frames. Whereas all three countries employ the liberal frame “indiscriminate threat – deliberation” and “indiscriminate threat – individual rights,” Singapore is the only case that uses the liberal frame “normal politics – international endorsement.” Israel is the only case in which the liberal frame “international interdependence – international endorsement” does not occur.

These findings are largely consistent with the ones presented in the previous sections. Singapore frames digital surveillance in the pandemic situation more liberally than the two democratic “backsliders,” India and Israel. Singapore does not employ illiberal framing of digital surveillance, whereas Israel and India do. The only different finding on the level of the frames is that Israel, compared to the total number of codes, does employ slightly more full-fledged illiberal frames than India, whereas India uses more illiberal diagnostic and prognostic subframes.

CONCLUSION: INTERROGATING DIGITAL SURVEILLANCE FURTHER

At the time of writing, in the Fall of 2020, the SARS-COV-2 virus is still a major global challenge. Vaccine trials by various research groups around the world are ongoing, but are also sometimes put on hold due to safety concerns, whereas mass vaccination remains a mid- to long-term rather than a short-term goal. Though some forecasters predict that the pandemic should “*end for the rich world by the end of 2021, and for the world at large by the end of 2022*” (Levy 2020), scientists admit that there are still too many unknowns about the virus and features of COVID-19 immunity to make sound predictions. In this atmosphere of uncertainty, surveillance and contact tracing, even in regions where cases of infection are on the decline, are suggested as the best approach (Scudellari 2020). Based on this, it is very likely that the COVID-19 pandemic will have societal repercussions for years to come.

In our analysis of diagnostic and prognostic subframes, we aimed to locate the particular types of framing employed by the Israeli, Indian and Singaporean governments, as they stand on different sides of the democracy-autocracy nexus. We have borrowed from theoretical works to discern liberal and illiberal pandemic subframes and constructed an analytical matrix (Table 1) which can be edited and repurposed to analyze government communication about digital surveillance in other situations and countries. Using tools of qualitative text analysis we found that in our analysis of diagnostic and prognostic subframes, the “backsliding” case of India showcases the most developed illiberal vernacular. Though it has talked about the pandemic as a threat to the “well-being of every Indian,” it has also overwhelmingly securitized the coronavirus in general, describing it in a colourful militant language. This complements the illiberal Indian policy action subframes: “othering” rhetoric, describing digital surveillance as a successful “top-down” initiative, and even showcasing instances of the government patronizing citizens. In contrast, Israel (a democracy which has seen a lesser degree of democratic recession) and Singapore (a “soft” autocracy) are way more liberal. In these cases, COVID-19 is not as securitized, but painted as an indiscriminate threat, while the respective government calls for an embrace of international cooperation. These regimes invest a lot of energy in portraying digital surveillance solutions as being in line with human rights and freedoms, and as being developed in a deliberative and “open-sourced” manner.

In the second part of our analysis, we further followed the tenets of framing theory, and explored different combinations of the diagnostic and prognostic rhetorical elements to uncover the frames they produce in each of our cases. The analysis indicates that Singapore uses more liberal and mixed frames to portray digital surveillance during the pandemic than the two democratic “backsliders” India and Israel. At the same time, India

and Israel use more illiberal frames than Singapore by combining illiberal diagnostic and prognostic rhetorical elements.

Our research calls for extending and combining the research agendas on “democratic backsliding” and crisis communication. On both levels of analysis, we find that democratic “backsliders” might find emergencies highly suitable for consolidating their illiberal tones, whereas stable “soft” autocracies like Singapore do not. By focusing on emergencies such as the COVID-19 pandemic we could identify and scrutinize pivotal moments, in which democratic “backsliders” may rhetorically outperform some autocracies. By integrating regime type and trajectory variables into the toolkit of crisis communication research, we could better understand how and why governments differently “speak” about emergencies and also better predict their policy responses.

Comparing our findings on India and Israel, we can speculate that different stages of democratic “backsliding” bear influence on the balance between the uses of liberal and illiberal rhetoric. At a more deteriorated stage of its democratic “backsliding,” India employs more illiberal diagnostic and prognostic subframes. Moreover, despite the uneasy history of inclusive domestic politics in Israel, India still outperforms it in terms of exclusivist framing. Nonetheless, scoring higher on indices of democratic “backsliding” does not necessarily have a linear effect on the extent to which and how governments employ illiberal and liberal framing. Whereas India uses more illiberal rhetorical elements than Israel, Israel employs more full fledged illiberal frames. This suggests that while the regime type and trajectory can play a role in the extent to which governments “talk” liberally or illiberally, other factors are also at play.

Our findings suggest that there is a multifaceted non-linear relationship between a pandemic crisis situation and politics. We do not only examine the relationship between the pandemic and the rhetoric employed by different regime types. We also analyse such rhetoric in relation to digital surveillance – a global phenomenon which will likely transform the ways we understand and practice politics in the next years. In this light, our findings suggest that, because they require swift coordination, isolation, tracing, and communication, pandemics will motivate all political regimes to employ new digital tools at their disposal to respond to crisis situations. However, different regime types will “talk” differently about these tools, which is relevant for the future of both liberal and digital politics.

Democratic “backsliders” might find it convenient to “recycle” frames we identify and justify the extended use of digital surveillance by references to a prolonged “warfare” against the virus, laying the path for introducing digital surveillance initiatives, which will be framed as “government-led” rather than “deliberative” measures. On the other hand, the case of Singapore illustrates that stable autocracies may actually find it beneficial to engage in liberal framing of the pandemic. Consistent usage of liberal diagnostic and prognostic subframes by the Singaporean government implies that, on a global level, autocracies won’t necessarily employ more illiberal speech in times of crises, but will surround their policies with a combination of liberal and illiberal rhetoric.

Irrespective of the regime type, we also find that the type of digital surveillance matters. Interestingly, mass contact-tracing applications which require consent are framed in more liberal ways than CCTV temperature screening systems, GPS- or credit card-based tracking and similar digital surveillance solutions. This variation may be beneficial in further research on human rights and privacy in democracies, and in studies of digital toolkits in authoritarian upgrading (Heydemann 2007; Keremoğlu – Weidmann 2020), especially in the light of the technological tendency towards decentralization and the rise of surveillance capitalism (Zuboff 2019). Governments across the regime nexus should see internalization of surveillance (Foucault 2012) as cost-efficient and are likely to repurpose the liberal subframes we detect to justify digital surveillance solutions, which require individual consent. They should do so by stressing a balance between individual

rights, privacy safeguards, personal benefits of individual participation, and “open-sourced,” internationally endorsed aspects of these tools.

The analytical approach presented in this article allows for a systemic follow-up and further interrogation of digital surveillance framing. Our empirical efforts can be continued by additional rounds of data collection. This would provide a more longitudinal view not only on the particular digital surveillance tools employed, but also on the evolving strategies of government surveillance framing. Such an effort is worthwhile, especially when bearing in mind that some framing elements that we derived theoretically have not yet been identified but may play an important role at later stages.¹⁴

¹ We define digital surveillance to be the direct collection of information, whether anonymous or identifiable, about individuals or groups using methods made available by digital technology.

² It is important to note the tension between analytical concepts like liberalism, which originated in the West, and the extent of their applicability in analyses concerned with the non-Western world (see for instance Acharya – Buzan 2007; Burnell et al. 2017). Here we subscribe to the understanding of the liberal script formulated by Tanja Börzel and Michael Zürn (2020), who claim that liberal ideas have borrowed and evolved through global encounters and intellectual exchange (which we unfortunately do not have the space to trace in this article) and thus are “travelling” concepts, which, though contested, can be globally applicable.

³ We distinguish between subframes, diagnostic and policy action rhetorical elements, and frames as more complex units consisting of different combinations of particular subframes. For the sake of simplicity, we define both the usage of subframes and the employment of frames as an action of “framing.”

⁴ For a detailed overview of the ethno-linguistic composition of our cases, we used the data from the CIA country factsheet (Central Intelligence Agency 2020).

⁵ Around 30 percent of the coded material has been double coded to check for inter-coder reliability.

⁶ The majority of Singapore’s liberal rhetorical instances are in reference to its contact-tracing app *TraceTogether*.

⁷ Singapore encourages its citizens to also use *SafeEntry* for contact tracing in public places.

⁸ Similar references to the success of its contact tracing app are also found in Singapore. In Israel such references are made only to justify the usage of the Shin Bet anti-terrorism surveillance.

⁹ In Singapore, the few rare illiberal rhetorical instances in regard to its contact tracing app *TraceTogether* related to its employment in work-places.

¹⁰ India has only one instance that belongs to the set of “international and regional support”.

¹¹ In Singapore, similar general references are used, but they appear more in relation to other digital surveillance measures and not to its contact-tracing app.

¹² Out of the 19 policy action rhetorical instances in India, only 11 were liberal. Despite their different regime types, Israel and Singapore use liberal rhetoric to a similar extent. In Israel, out of a total of 14 rhetorical instances, 9 were liberal; in Singapore, it was 21 out of 32.

¹³ In India, out of 19 rhetorical instances, 8 were illiberal; in Israel, 5 out of 14 were illiberal; in Singapore, 9 out of 32 were illiberal.

¹⁴ These are: the “international blame-shifting,” “endorsement of authoritarian gravity centres” and “admittance of criticism” frames.

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