



Faculty of Humanities and Social Sciences
Bachelor in Global Communication

Final Degree Thesis

Framing the Hong Kong National Security Law:
A Comparative Analysis of *People's Daily*, *Hong Kong Free Press*, and
The Guardian.

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Madrid, June 2023

ABSTRACT

On June 30th 2020 the People's Republic of China (PRC) enacted the Hong Kong National Security Law (NSL), formally the Law of the PRC on Safeguarding National Security in the Hong Kong Special Administrative Region, under the decision of the National People's Congress, and by accordance with the Hong Kong Special Administrative Region (SAR) Basic Law and the Constitution of the PRC. The legal document fueled the protests that started in 2019 with the Anti-Extradition Bill Movement and, thus, had extensive media coverage. However, the framing of the Law varied across the spectrum and reflected the newspapers' political stances from pro-Beijing to pro-democracy. The hypothesis of this thesis is that pro-establishment newspapers were more prone to frame the National Security Law positively to safeguard and guarantee rights and pan-democracy newspapers negatively as a violation of human rights. This thesis has per purpose to examine how four newspapers constructed the legislation one month before and after the enactment of the law: *People's Daily* (pro-Beijing), *Hong Kong Free Press* (pro-democracy), and *the Guardian* (international and inclined towards the pan-democracy camp).

Keywords: Hong Kong National Security Law, framing, *China Daily*, *Hong Kong Free Press*, *South China Morning Post*, *The Guardian*, human rights.

RESUMEN

El 30 de junio de 2020, la República Popular China (RPC) promulgó la Ley de Seguridad Nacional de Hong Kong (NSL), formalmente la Ley de la RPC sobre la Salvaguarda de la Seguridad Nacional en la Región Administrativa Especial de Hong Kong, en virtud de la decisión de la Asamblea Popular Nacional y de acuerdo con la Ley Básica de la Región Administrativa Especial (RAE) de Hong Kong y la Constitución de la República Popular China. El documento legal alimentó las protestas que comenzaron en 2019 con el Movimiento contra la Ley de Extradición y, por tanto, tuvo una amplia cobertura mediática. Sin embargo, el encuadre de la Ley varió a lo largo del espectro reflejando las posturas políticas de los periódicos, desde pro-Beijing a pro-democracia. La hipótesis que presentas esta tesis es que los periódicos favorables al establishment eran más propensos a enmarcar positivamente la Ley de Seguridad Nacional para salvaguardar y garantizar los derechos y los periódicos prodemocráticos negativamente como una violación de los derechos humanos. Esta tesis tiene por objeto examinar cómo cuatro periódicos construyeron la legislación un mes antes y después de la promulgación de la ley: *People's Daily* (pro-Beijing), *Hong Kong*

Free Press (pro-democracia), y *The Guardian* (internacional e inclinado hacia el campo de la pan-democracia).

Palabras clave: Ley de Seguridad Nacional de Hong Kong, framing, *China Daily*, *Hong Kong Free Press*, *South China Morning Post*, *The Guardian*, derechos humanos.

Abbreviations:

| | |
|--------------|--|
| CCP | Chinese Communist Party |
| HKFP | Hong Kong Free Press |
| HKNSL | Hong Kong National Security Law |
| HKSAR | Hong Kong Special Administrative Region |
| NSL | National Security Law |
| PRC | People's Republic of China |
| SCNPC | Standing Committee of the National People's Congress |
| SAR | Special Administrative Region |

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I. Introduction

1.1. Background information

On May 28, 2020, the National People's Council of the People's Republic of China (PRC) convened to consider the implementation of a national security law for the Hong Kong Special Administrative Region (HKSAR) (Lo, 2021, p.34). The decision to do so was made in response to the anti-extradition (Anti-ELAB) movement that occurred in the latter half of 2019, which the Chinese government believed was influenced by foreign forces meddling in HKSAR affairs (Lo, 2021, p.34). An abstract of the draft national security law (NSL) was released by the council from June 18 to 20, with the council officially approving the promulgation of the law on June 30 (Lo, 2021, p.34). This law, which was entitled *The Law of the People's Republic of China on Safeguarding National Security in the Hong Kong Special Administrative Region*, was incorporated into Annex 3 of the Hong Kong Basic Law (Article 1). Nonetheless, the citizens of Hong Kong were not granted access to the NSL for review prior to its enactment. Instead, the law was expeditiously incorporated and enforced by 11h00 pm on the very same day (Petersen, 2020, p.634). This law has had immediate and significant repercussions in Hongkongers daily lives and Hong Kong's *raison d'être*, impacting social, judicial, political, media, and educational spheres.

Hong Kong is widely regarded as a distinctive territory owing to its unique history as a former British colony and its status as a Special Administrative Region (SAR) of the PRC. As a consequence of the establishment of "British Hong Kong" over 150 years ago and the formation of the PRC in 1949, Hong Kong and the PRC have evolved separate and different legal and political cultures (Fu & Cullen, 2002, p.185). In effect, Hong Kong's unique status is founded on the international treaty obligations set forth in the Sino-British Joint Declaration, a bilateral treaty between China and the United Kingdom (Chopra & Pils, 2022, p.293). Such a treaty came to being as the British lease expiration of the New Territories in Hong Kong approached in the 1980s (Fu & Cullen, 2002, p.185). Under this treaty, Hong Kong is allowed to maintain a "high degree of autonomy" for a period of fifty years until 2047, through the "One Country, Two Systems" framework which is enshrined in the territory's regional constitution, known as the Basic Law (Chopra & Pils, 2022, p.293; Baehr,

2022, p.227). Such an unprecedented level of autonomy and rights is not attainable to China's Mainland citizens.

HKNSL follows a series of watershed moments that register in Hong Kong's autonomy history and its democracy movement. In 2013, after two unsuccessful endeavors towards political reform and with another impending, advocates from civil society launched the 'Occupy Hong Kong with love and peace' campaign (Du et al., 2018; Chopra & Pils, 2022, p. 297). They declared their intention to occupy the city's business district if the forthcoming reforms to the Chief Executive - head of Hong Kong's government - election did not include genuine universal suffrage. However, the 2014 reforms fell short of even conservative reform proposals, leading to sit-ins on some of Hong Kong's busiest roads, which lasted for 79 days entangling in the Umbrella Movement (Cheung, 2022). Despite this, neither the Hong Kong government nor Beijing made any concessions (Yuen, 2019, p.185; as cited in Chopra & Pils, 2022, p.297). As expected, pan-democrat legislators voted against the Standing Committee of the National People's Congress (SCNPC)-authorised reforms en masse (Chopra & Pils, 2022, p.297). Another significant event occurred in 2019 when the Hong Kong government proposed a statutory amendment to enable the extradition of criminal suspects to Mainland China (Cheung, 2022). The 'extradition bill' caused widespread unease over the rule of law and representative government, as had the abduction of Hong Kong booksellers in 2015 and the SCNPC's heavy-handed intervention in judicial decision-making (Chopra, 2020; as cited in Chopra & Pils, 2022, p.297). The largest of several protest marches saw approximately 2 million of Hong Kong's 7.5 million residents take to the streets. Despite the Hong Kong government's suspension of the extradition bill, mass protests continued, evolving into mobilization for political reform (Chopra & Pils, 2022, p.297). Mobilization that was ultimately met with the implementation of HKNSL.

It seems pertinent to note that the timing of the law's enactment is closely aligned with both the anniversary of the Handover of Hong Kong on July 1st, 1997, and the commemoration of the Tiananmen Massacre on June 4th, 1989. Hong Kong, a city with a longstanding history of cultivating democratic ideals, holds a profound reverence for the June 4th movement and the Tiananmen incident, which are commemorated annually through a solemn vigil in Victoria Park. Citing the COVID-19 outbreak as the reason, the police banned the vigil in 2020 and barricaded the park to deter gatherings. Hong Kongers, especially democracy activists, understood such action as "an accelerating erosion of the city's rights and liberties" (Soo &

Moritsugu, 2020). In turn, Beijing sees the remembrance of Tiananmen as a threat to its sovereignty, thus, it is rare for the government's mouthpieces to address the event. They much rather focus on the date from which China recovered Hong Kong, the 1997 Handover from Britain.

The interpretation of the NSL is subject to contrasting perspectives: from the Western viewpoint it is a clear violation of Hong Kong's autonomy and freedoms, yet the Chinese narrative justifies the implementation of the law on the grounds to safeguard the rights of Hong Kong and Mainland China's rights. Effectively, Chinese rationale holds that the HKNSL is designed to address the ongoing unrest in Hong Kong by prohibiting and penalizing offenses such as secession, subversion, terrorism, and collusion with foreign entities to endanger national security (Lau, 2021, p.235). The reasoning: such severe crimes have become increasingly frequent in Hong Kong since its return to China, particularly in the last three years, posing significant challenges to the SAR government's ability to govern effectively amidst persistent political instability (Lau, 2021, p. 235). Contrastingly, several foreign nations, such as the United States or the United Kingdom, have expressed deep concerns regarding the newly enacted law (Lo, 2020), with various human rights experts and international organizations expressing criticism towards it (Petersen, 2020). Consequently, there is a high likelihood that the coverage and reporting on the law will vary between narratives that are supportive or opposed to it.

Moreover, the promulgation of the HKNSL has eroded one of the freedoms which Hong Kong has long enjoyed, namely the freedom of expression. Shortly after the HKNSL was promulgated, the police in Hong Kong began apprehending anyone displaying banners calling for Hong Kong's independence or "liberation" (Leung, 2020). In August 2020, three pro-democracy activists and Jimmy Lai, the well-known publisher of Hong Kong's popular pro-democracy newspaper, Apple Daily, were taken into custody on suspicion of "collusion with foreign forces" (Lo et al., 2020; as cited in Petersen, 2020). On the same day, hundreds of police officers conducted a search and seizure operation at the offices of Apple Daily, which has been widely criticized by local journalists (Petersen, 2020). Apple Daily, and its founder Jimmy Lai, had become symbols of the pro-democracy movement in Hong Kong and a thorn in the side of the government and police. The paper was raided by a crackdown by the government that included freezing of its assets, and arrests of its staff under the NSL (Davidson, 2021). As a result, the management announced the immediate closure of the

paper, citing concerns for staff safety. This move marks a significant blow to press freedom in Hong Kong and serves as a warning to foreign media outlets operating there (Davidson, 2021). In December, 2022 Jimmy Lai was sentenced on Saturday to five years and nine months (Pang & Pomfret, 2022). Thus, questions arise as to how other newspapers, local and foreign, might cover the law.

1.2. Purpose and Motives

In light of the present context, this dissertation aims to delve on the variation of ‘frames’ of the NSL that have been utilized by a series of newspapers in a given period of time, namely prior to and afterward the implementation of the law. Hence, the grounds for the study lie on how newspapers - in Hong Kong, Mainland China, and abroad (United Kingdom) - construct such a turning point in Hong Kong’s history. Ultimately, media coverage has the potential to shape public perceptions and attitudes towards a specific juncture.

In the past decades Hong Kong has sat at the center stage for international attention to scrutinize the development of autonomy and the growing CCP’s repression, particularly since Xi Jinping’s coming to power and the rise of protest movements in 2019. Hong Kong’s unique character as a territory under the authoritarian umbrella of the PRC, yet enjoying a high degree of autonomy as a former British colony, makes it a compelling subject for studying freedom of the press and media coverage. The reason being the clear distinction between pro-democracy and pro-China (explicitly known as pro-Establishment) newspapers. Each represent opposing ends of the spectrum with incompatible narratives and perspectives, particularly pertaining to the NSL. While pro-Beijing news, scholars, and the government frame the law as ‘safeguarding’ citizens’ rights, pro-democracy greatly criticize the law as a violation of rights, as has been aforementioned. Consequently, this thesis is motivated to study the framing of the law, distinctively, in the matter of ‘human rights’.

Academic research on Hong Kong news framing has put under inspection former events before the HKNSL was implemented such as *Occupy Central*, the *Anti-ELAB movement*, or the protests as a whole. Likewise, special attention is also owed to the evolution of both China’s ‘One Country, Two Systems’ framework over Hong Kong and of Hongkongers’ identities since the Handover in 1997. Evidently, the HKNSL has hindered thorough and open investigation with regards to the press and media as newspapers and journalists can be

targeted by the law, as was the case of Apple Daily. That is precisely why this dissertation puts forth the purpose to explore the theories of Framing and news construction in relation to the HKNSL. Therefore, a careful analysis of Framing Theory and the relevant key concepts must be carried out to then put under study the hypothesis and research questions advanced.

Moreover, the decision of which newspapers to study and analyze is related to the purposes and motives of this dissertation. Once again, the aim is to assess the variation in framing between pro-Establishment newspapers and pro-democracy. Such variation is subject to the object of study of this thesis which is in regards to ‘human rights’: whether the newspapers frame the law as a safeguard or violation of human rights. The selection is nonetheless conditioned by the language limitation which prompts the thesis to analyze only English-language newspapers. Among the newspapers that are pertinent to the study are: *China Daily*, *People’s Daily Online*, *South China Morning Post (SCMP)*, *Hong Kong Free Press (HKFP)*, and *The Guardian*. However, only *People’s Daily*, *HKFP*, and *The Guardian* will be analyzed. As the largest English-language daily newspaper in China, *China Daily* is owned by the state but is not officially a mouthpiece of the ruling Communist Party (*China Daily*, n.d.). Compared to other Chinese state-run newspapers, it is considered more liberal, although it is still subject to state censorship (*China Daily*, n.d.). As a result, the dissertation will review the *People’s Daily* - 人民日报 - instead, which is recognized as the official newspaper of the Chinese Communist Party Central Committee (Cheng, 2009). Additionally, as the most prominent and authoritative newspaper in China, it serves as the primary medium to articulate the official standpoint of the Chinese central government (Cheng, 2009). With contrasting frames, we find *SCMP* and *HKFP*. *SCMP* founded in 1903 is considered to be more neutral and *HKFP* was described by former Lingnan University Chair Professor, Peter Baehr, as “Perhaps the only independent news outlet left in good shape” (Baehr, 2022). Thus, *HKFP* will be analyzed. Finally, to fully grasp the objectives set out, *The Guardian* will be also taken into account as, ultimately, being a party to the Sino-British Joint Declaration, the United Kingdom holds a significant stake and responsibility in evaluating China’s adherence to the terms outlined in the agreement (Petersen, 2020).

II. State of the Art

2.1. The Hong Kong National Security Law

The Basic Law was established to serve as both the new constitution of the HKSAR upon its reunification with Mainland China in July 1997 and as a crucial document outlining various legal and political powers that relate to the HKSAR's interactions with Mainland China (Fu & Cullen, 2002, p.185). The present HKNSL follows as set in Chapter II of the Basic Law under Article 23, re-drafted after Tiananmen Square Protests in 1989, which prescribes the national security laws that are required to be in place in the HKSAR to prevent external or internal entities from undermining the fundamental political framework in Hong Kong or encroaching upon the authority of the Central People's Government (CPG) in Beijing (Fu & Cullen, 2002, p.185). Article 23 of Chapter II grants as follows:

“The Hong Kong Special Administrative Region shall enact laws on its own to prohibit any act of treason, secession, sedition, subversion against the Central People's Government, or theft of state secrets, to prohibit foreign political organizations or bodies from conducting political activities in the Region, and to prohibit political organizations or bodies of the Region from establishing ties with foreign political organizations or bodies” (Hong Kong Administrative Region, 1997).

Hualing, Petersen, and Young (2005) consider such an article a, fundamentally, highly contentious provision within the constitutional framework of Hong Kong. Indeed, in their book *National Security and Fundamental Freedoms: Hong Kong's Article 23 Under Scrutiny* the authors write about how “the debates over how this provision should be implemented embody the tension that is inherent in the ‘one country, two systems’ model that governs Hong Kong's relationship with the Mainland” (Hualing et. al., 2005, p.1). Virtually, from the Chinese government's standpoint, the allowance for Hong Kong to establish its own laws in this area is seen as a concession, considering that the responsibility for Hong Kong's defense lies with the Central People's Government (Hualing et. al., 2005, p.1). Conversely, many Hong Kong residents view Article 23 as a grave threat to their civil liberties, as concepts such as ‘subversion’ and ‘secession’ are unfamiliar in the Hong Kong legal system. Even familiar terms like ‘theft of state secrets’ take on a more ominous connotation when placed in the

context of the Mainland's notably broad definition of 'state secret' (Hualing et. al., 2005, p.1). It has long been assumed that the Chinese government would exert influence over the drafting of legislation related to Article 23, given its role in appointing Hong Kong's Chief Executive. Additionally, under Article 17 of the Basic Law, the SCNPC possesses the power to invalidate local laws that are deemed inconsistent with the Basic Law regarding Beijing's jurisdiction or the relationship between the Central Authorities and the SAR (Hualing et. al., 2005, p. 2). Consequently, the implementation of Article 23 in a manner that satisfies Beijing's concerns while safeguarding the rights and freedoms of Hong Kong residents has posed one of the most onerous challenges for the Hong Kong government.

In September 2002, the government released its proposals of the provision through a Consultation Document, after which the *National Security (Legislative Provisions) Bill 2003*, known as 'The Bill' was drafted and introduced in February 2003 (Hualing et. al., 2005, p.2). Nonetheless, the government's rigid approach to the legislative process, combined with the economic downturn and the distress caused by the SARS epidemic, resulted in a significant wave of dissatisfaction in 2003, often referred to as the "spring of discontent" (Hualing et. al., 2005, p. 2; Baker Mackenzie, 2020). Therefore, on July 1, 2003, just eight days before the Legislative Council was scheduled to resume the second reading debate on the Bill, an unprecedented number of over 500,000 people took to the streets in protest. This historic march stands as the largest ever held against the Hong Kong government and the second-largest demonstration in the city's history, surpassed only by the 1989 demonstrations in support of the students at Tiananmen Square. The massive turnout surprised nearly everyone, leading even the typically pro-government Liberal Party to withdraw its support for enacting the Bill in July 2003. Ultimately, the government was compelled to postpone and eventually withdraw the Bill from the legislature (Hualing et. al., 2005, p. 2).

As a result, legislation of Article 23 has yet to be finalized (Chen, 2023). As Hualing et. al. (2005) argued "Hong Kong does have a constitutional duty to implement Article 23 and the reaction of the Chinese government to the withdrawal of the Bill indicates that it will not wait indefinitely". However, there is little doubt that such law will not be greatly defined by Beijing as under Article 158 of the Basic Law, the SCNPC has the overriding power to issue interpretations of any article within the Basic Law, thereby establishing binding directives for the courts in Hong Kong (Hualing et. al, 2005). In effect, this past January of 2023, John Lee Ka-chiu, HKSAR Chief Executive called for the completion of the Article. Similarly, Article

7 of the HKNSL provides that “The Hong Kong Special Administrative Region shall complete, as early as possible, legislation for safeguarding national security as stipulated in the Basic Law of the Hong Kong Special Administrative Region and shall refine relevant laws” (HKSAR, 2020). For instance, the NSL includes offenses that are not covered by Article 23 of the Basic Law, such as the offense of terrorism. Additionally, the NSL does not cover offenses for treason, sedition, and theft of state secrets, which are covered by Article 23 (Qingqing, 2023). Effectively, the purpose of the NSL was to fulfill the decision taken by the Fourth Plenary Session of the 19th Central Committee of the Communist Party of China at the end of 2019, which aimed to “establish and improve the legal system and implementation mechanism of the special administrative region to maintain national security.”; thereby addressing the gap left by the HKSAR’s for not fully enacting Article 23 of the Basic Law (Lau, 2021).

The NSL criminalizes four types of acts - secession, subversion, terrorist activities, and collusion with a foreign country or with external elements to endanger national security - and stipulated corresponding penalties, which, in the most serious cases, could result in life imprisonment (Baker McKenzie, 2020; HKSAR, 2020). To enforce the Law, the HKSAR established a new Committee for Safeguarding National Security of the HKSAR, led by the Chief Executive of the HKSAR (Baker McKenzie, 2020). The Hong Kong Police Force and the Department of Justice set up designated departments to handle crimes against national security, and the Chief Executive designated relevant judges to adjudicate such crimes (Baker McKenzie, 2020). The executive, legislative, and judicial organs are required to adhere to the rule of law in preventing, suppressing, and punishing offenses that endangered national security, while also respecting human rights and the rights and freedom of HKSAR residents according to the law (Baker Mackenzie, 2020). The HKSAR exercises jurisdiction over offenses under the NSL, except for specified circumstances. The Central People’s Government established the Office for Safeguarding National Security of the CPG in the HKSAR to oversee and guide the work of the HKSAR in safeguarding national security. Ultimately, in cases of conflict between local laws of the HKSAR and the NSL, the NSL prevailed (Baker Mackenzie, 2020).

Article 4 of the NSL provides that

“[...] The rights and freedoms, including the freedoms of speech, of the press, of publication, [...] which the residents of the Region enjoy under the Basic Law of the Hong Kong Special Administrative Region and the provisions of the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights as applied to Hong Kong, shall be protected in accordance with the law.” (HKSAR, 2020).

Nonetheless, a close analysis of other provisions within the NSL reveals that the freedom of the press has been redefined to deviate significantly from the traditional liberal concept of a free press under constitutional common law (Cheung, 2022). Article 9 mandates that the government of HKSAR enforce stricter supervision and regulation of both the media and the internet, while Article 10 requires them to promote national security education through these channels (HKSAR, 2020; Cheung, 2022). Article 54 empowers the relevant authorities to enhance the management and services of foreign news agencies (HKSAR, 2020; Cheung, 2022). Additionally, under Articles 43(1) and 43(7), news materials and journalistic sources are no longer protected by the previous law, as the authorities can search any relevant location (including media organizations) and require any person suspected, on reasonable grounds, of possessing information or materials relevant to an investigation to answer questions and provide such information (HKSAR, 2020; Cheung, 2022). Such provisions reveal the gradual yet definite changes of freedom of press in Hong Kong under the NSL. Moreover, these align entirely with the socialist press doctrine whereby mass communication media fulfills a positive duty of supporting and assisting the state in achieving its objectives while preventing any disruption of such goals (Cheung, 2022).

In terms of protecting freedom of speech and press, democratic societies and authoritarian countries exist at opposite ends of the spectrum. Democratic societies have strong constitutional protections, well-crafted laws that balance free expression with other legitimate goals, and judicial decisions that prioritize press freedom. Conversely, authoritarian countries provide weak constitutional protections and impose harsh laws, including criminal libel, to curtail free expression. The press is heavily regulated, and journalists working on sensitive or critical stories face significant legal risks (Crook, 2009; Eko, 2010; as cited in Lee & Chan, 2022).

2.2. The Changing Landscape of Hong Kong Media

The period following the 1997 handover has seen a decline in press freedom in Hong Kong. In effect, in 2022, Hong Kong was ranked 148th out of 180 regions on the World Press Freedom Index (Reporters Without Borders, 2022), representing a significant drop from its 18th place ranking in 2002 (Reporters Without Borders, 2002; as cited in Cheung, 2022). Moreover, Hong Kong's decline in the press freedom index of Reporters Without Borders is a clear reflection of the impact of the NSL on the media landscape in the region. The ranking dropped remarkably from 80 in 2020 to 148 in 2022, indicating a substantial setback for press freedom (Lee & Chan, 2022). In the past decade, the Hong Kong Journalists Association (HKJA) has consistently shown concerns about threats to freedom of expression and the press, evident in the titles of its annual reports. For instance, the 2015 report titled "Hong Kong media faces serious harassment and self-censorship" and the 2017 report titled "Beijing turns the screws on Hong Kong media" (Lee, 2018).

The Hong Kong government during the colonial period had implemented strict press laws. However, these laws were infrequently enforced to regulate the press due to the need to avoid inciting China and because the Hong Kong press at that time concentrated on Chinese politics, rather than domestic social and political affairs (Lee, 2018). "Press freedom" then meant the liberty to critique both the Communist regime in the PRC and the KMT regime in Taiwan, provided that the colonial government was not challenged (Chan and Lee, 1991; as cited in Lee, 2018). The negotiations and joint declaration between China and Britain concerning the future of Hong Kong resulted in a "dual power structure" that maintained a balance of power and influence between the two countries (Chan and Lee, 1991; as cited in Lee, 2018). This balance provided the Hong Kong press with an exceptional degree of freedom during the transition period from 1984 to 1997. However, as the handover approached, China's influence grew, and the political and economic structure of the Hong Kong media system began to shift (Lee, 2018). In the mid-2000s, a significant proportion of media entities in Hong Kong were controlled by business figures with considerable interests in mainland China. Fung's (2007) assessment characterized the circumstance as non-organizational ownership concentration, where multiple business individuals collectively held media ownership, united in their shared objective of maintaining good relations with the Chinese government (Lee, 2018). The underlying reason is that owning a news organization

in Hong Kong offers a business person symbolic capital that can be utilized to obtain social and political capital in mainland China (Lee, 2018).

The pro-democracy Apple Daily ceased operations in June 2021, following the arrest of its owner and top editorial staff under the NSL. Similarly, in December 2021, the leading pro-democracy online news outlet, Stand News, closed down after its leaders were arrested by the police for “conspiring to incite.” Shortly after, another online outlet, Citizen News, also stopped operations, citing legal risks as the primary reason. Investigative news platform Factwire also ceased operations (Cheung, 2022; Lee & Chan, 2022). The detention and shut down of these are as stipulated in Article 42 which provides that “[...] No bail shall be granted to a criminal suspect or defendant unless the judge has sufficient grounds for believing that the criminal suspect or defendant will not continue to commit acts endangering national security.” (HKSAR, 2020). In June 2021, the publisher, chief editor, and managing editor of Apple Daily, along with nine others, were charged with “collusion with a foreign country or with external elements to endanger national security” under article 29(4) of the NSL (HKSAR, 2020; Cheung, 2022). They were denied bail, similar to Jimmy Lai’s fate.

2.3. Literature Review

In light of the changing circumstances of Hong Kong’s mass media communications and press freedom greatly due to the NSL, this dissertation has per objective to explore and review the existing body of literature on the subject matter. The ultimate purpose that this thesis has set forth is to analyze the different frames of the NSL used by newspapers. Thus, the review of literature consists of scrutinizing the results of similar studies on how watershed phenomena in Hong Kong have been framed. These will assist in the present study concerning the NSL.

Du, Zhu & Yang (2018) conducted a study on how “Occupy Central” was framed in the news, namely in Hong Kong. The research article applied framing theory and the protest paradigm to the specific political crisis in Hong Kong, hence revealing how news media with different ideological backgrounds reported the same events and issues in varying ways. Du et al. (2018) contend that the protest paradigm provides theoretical backing to understand the coverage of protests. Likewise to the hypothesis proposed in this thesis, newspapers with a right-leaning ideology emphasized maintaining social order and the existing state of affairs,

whereas those with a left-leaning ideology prioritized the perspective of the protesters (Chan & Lee, 1984; as cited in Du et al., 2018). The results of the study concluded, first, that China was more inclined to support the “pro-government” viewpoint, while newspapers from the UK tended to favor the “pro-protester” stance; second, that in media outlets outside of mainland China, government actions were predominantly portrayed as suppressive or violently suppressive, while within mainland China media, they were generally framed in a conciliatory manner; thirdly, the findings suggested that in mainland China, protester behavior was portrayed as violent, whereas in other sources, it was depicted as less violent. Finally, regarding the primary cause of conflicts, newspapers in China, Hong Kong, and Taiwan attributed it more to internal conflict caused by Hong Kong’s government or residents, while UK and U.S. newspapers tended to blame the Chinese government as the external cause (Du et al., 2018). These findings are compelling to the rationale of the present dissertation as they suggest that the coverage of the NSL will most notably align.

In a similar fashion, Mengjiao Yu (2015) previously carried out a thorough and extensive study on the same subject: Occupy Central. Du et al. (2018) findings were congruous with Yu. Yu’s findings demonstrate the presence of diverse news frames reflecting varying professional values and structural constraints, highlighting the co-existence of authoritarian and liberal views of the press in Hong Kong. Particularly, few SCMP articles mentioned politically sensitive issues such as human rights and democracy (15.8%) and framed the protests as detrimental to Hong Kong (57.9%). In contrast, *The New York Times* and *The Guardian* related the protests to political issues and framed them as beneficial to Hong Kong society. Additionally, the South China Morning Post was more likely to frame the protesters negatively and portray the Hong Kong government positively compared to the other two newspapers. In view of such results, the hypothesis put forth in this thesis will contend similarly. Yu concluded his argument by asserting how “a comprehensive picture of frame building (how frames are being chosen by journalists in news reporting) and frame setting (how frames exert their influence on audiences’ attitudes and opinions) may eventually emerge” (Yu, 2015). In this study, it was found that the tone of news articles was not always linked with framing devices such as radical/illogical, negative impact, and public disapproval. The relationship between overall tone and framing devices was not consistent due to the conflicting nature of the three newspapers analyzed.

Consistently, Guofeng Wang and Xueqin Ma (2021) explore the 2019-20 Hong Kong protests in order to assess how protestors were constructed in China Daily and The New York Times. The argument made by the authors is that, ultimately, “the dominant ideology is embedded in news framing and language patterns in news discourse” (Wang & Ma, 2021). The findings of their research concluded that China Daily presented the Chinese government’s stance on the matter as being centered on the framework of “one country, two systems” regarding the political mass movement that ultimately became illegal riots. On the other hand, The New York Times focused on the pro-democracy perspective of the movement, which aimed to challenge China’s control over the territory, and adopted an anti-China and anti-communism ideology. This could suggest that the journalistic practices in the US have deviated from the professional standards set in the nineteenth century and are now as politically motivated as those in China (Wang & Ma, 2021).

Another research paper was published in 2021 by Magdalene Che, Nerilee Hall and Debs Taylor pertaining to the framing of the Anti-Extradition Bill Movement. The importance of this movement and the framing of such is significant to this thesis as it was the movement that preceded the implementation of the NSL. The hypothesis of this study was to examine whether there is a difference in the frequency of framing devices used by three newspapers - Apple Daily, WWP, and NYT - in their coverage of the Anti-ELAB movement. The findings indicated that the newspapers’ political stance influenced the use of framing devices. Apple Daily, a pro-democracy newspaper, had a higher frequency of framing devices that supported their cause, while WWP, a pro-Beijing newspaper, had a higher frequency of framing devices that supported the government’s actions during the movement. NYT, a politically unaligned newspaper, had moderate frequencies of framing devices and presented a more objective standpoint about the movement (Che et al., 2021).

Lastly, building on the effects of the HKNSL, Princeton University’s Wang and Mayer (2022) carried out a study on self-censorship under law, effectively analyzing how the enactment of laws that limit freedom of speech can lead to a phenomenon of self-censorship online and bring about changes in the nature of online discussions. Based on a comparative approach on the online activity prior and after the enactment of the NSL, the study found that Hong Kongers were subject to two types of self-censorship: users being likely to ‘remove past online activity’ or ‘restricts or delete their account’; and Hong Kongers posting less often about ‘politically sensitive issues’ previously censored in Mainland China social media

platforms (Wang & Mayer, 2022). The findings derived from analyzing tweets posted during the period surrounding the implementation of the HKNSL provide valuable insights into the profound influence of this legislation on the channels and modes of news dissemination and communication. If we consider the effects that newspaper framing has on the population the scope of self-censorship is even more likely to increase. Self-censorship in Hong Kong after the NSL, emanates from the danger that posting sensitive information contrary to the government entails. Such a phenomenon also has an impact in how newspapers may frame the news in order to avoid going against the NSL implemented.

III. Theoretical Framework

To address the inquiries posed in this thesis effectively, it is crucial to introduce Framing Theory as the underlying theoretical framework. This theory, along with other relevant theories, will provide the necessary premises to shed light on the subject matter. By adopting framing theory as the conventional wisdom, we can unravel the significance of the NSL and the various interpretations surrounding its exposure. In this context, the chosen theoretical framework enables an analysis focused on the framing of the news within newspapers. This analysis aims not only to reveal the positions taken by each newspaper but also to uncover how readers and the general public may develop varying understandings of the HKNSL based on their choice of newspaper.

3.1. Framing Theory and News Framing

The term ‘frame’ first originated in the psychology of Gregory Bateson as a “mental concept” (Koziner, 2013). Later applied by Erving Goffman in the field of sociology, framing acquired a broader significance, which would later be incorporated into studies of social movements and media communication. The legacy that these initial uses of framing by psychology and sociology left for later communication studies consisted of providing an understanding of how social reality is constructed through language and personal interactions (Aruguete, 2009; as cited in Koziner, 2013, p.12).

Bateson proposed the concept of frame in 1972 to explain the phenomenon of interpretation in the reception of messages that occurs in a communicative process, that is, why individuals focus on certain aspects of reality while disregarding others (Koziner, 2013). He described

psychological frames as a “spatial and temporary bounding of a set of interactive messages” (Bateson, 1972, p. 197), ergo, from a psychological perspective, Bateson conceives frames as elements of the psyche through which differences between things are established. In effect, he views the frame as the element that delimits the canvas. At the same time, the frame allows us to distinguish the painting from the wall on which it is hung, as explained with his second analogy (Koziner, 2013).

Erving Goffman (1986) narrowed down Bateson’s use of the term ‘frame’ and associated it with sociology in his book *Frame Analysis: An Essay on the Organization of Experience* (Koziner, 2013; Yu, 2015, p. 3; Ping, 2022, p. 1511). Goffman assumed that “definitions of a situation are built up in accordance with principles of organization which govern events – at least social ones – and our subjective involvement in them” (Goffman, 1986, p.10). He used the word frame to the basic elements as he was able to identify (Goffman, 1986, p.10). Consistently, ‘frame analysis’ was the ‘slogan’ he used which involves examining the organization of our experiences within these frames or terms of organization (Goffman, 1986, p.11). According to the author, individuals in Western societies tend to understand the issues that take place around the world on the basis of their own “primary framework” (1974, p. 21). Namely, a framework that is “seen as rendering what would otherwise be a meaningless aspect of the scene into something that is meaningful” (Goffman, 1974, p. 21). Goffman distinguishes between two broad types of primary frameworks: natural and social. Natural frameworks aim to identify events that lack direction, orientation, animation, or guidance, “purely physical”; while social frameworks provide a contextual understanding of events involving the will, purpose, and controlling efforts of intelligent beings, with humans being the ‘chief’ of the ‘live agency’, that is, most significant (1974, p. 22). These frames act as the foundation of individuals’ understanding of reality and information. Indeed, Goffman explains that “in countless ways and ceaselessly, social life takes up and freezes into itself the understanding we have of it” (1974, p. 563).

Furthermore, mass communication research has expanded on the concept of ‘frames’, leading to a gradual shift in emphasis from pre-existing mental frameworks (frames) to the strategies and techniques employed in constructing or influencing these frameworks (framing) through the process of communication (Yu, 2015). Subsequently, different scholars have employed the term ‘frame’ to refer to slightly distinct concepts. For instance, Gamson (1989, p.157; as cited in Ping 2022, p. 1511) asserts that frames have been described as central organizing

ideas that help us “make sense of relevant events and suggest what is at issue”. Indeed, Gamson and Modigliani (1989) describe frames as “interpretative packages” that bestow meaning upon an issue (p. 3). These packages revolve around a central organizing idea or frame that enables comprehension of relevant events and highlights the underlying concerns (Gamson & Modigliani, 1989, p. 3; as cited in Claes, 2005, p. 53). Frames, as defined by Gitlin (1980, p. 7; as cited in Claes, 2005, p. 52), encompass the persistent patterns of cognition, interpretation, and presentation that symbol-handlers routinely employ to organize discourse. The term has also been used as a reference to “a sense of what activity is being engaged in, how speakers mean what they say (Tannen & Wallerstein, 1993, p.60, as cited in Ping, 2022, p. 1511). According to Tankard, it is “a central organizing idea of informative content that provides context and suggests the topic through the use of selection, emphasis, exclusion, and elaboration” (2001, p. 3; as cited in Koziner, 2013). Reese (2001), on the other hand, provided one of the most comprehensive definitions of frames, defining them as “socially shared and persistent organizing principles that symbolically work to structure the social world in a meaningful way” (p. 11; as cited in Koziner, 2013). In effect, Cappella and Jamieson (1997, p. 47; as cited in Claes, 2005, p. 53) argue that frames activate knowledge, evoke cultural values, and establish contextual frameworks. Consequently, frames serve to define problems, identify causes, pass moral judgments, and propose remedies (Entman, 1993). In the realm of news, a broader understanding of frames aligns with the idea of a central organizing idea or storyline that provides meaning to a sequence of unfolding events, weaving connections among them and revealing the essence of the controversy (Gamson & Modigliani, 1989; as cited in Claes, 2005, p. 53).

In his 1993 essay *Framing: Towards Clarification of a Fractured Paradigm*, Entman argues that, ultimately, the idea of ‘framing’ is a “scattered conceptualization” as “despite its omnipresence across the social sciences and humanities, nowhere is there a general statement of framing theory that shows exactly how frames become embedded within and make themselves manifest in a text, or how framing influences thinking” (Entman, 1993, p. 51). Thus, he intended to provide a more precise and universal understanding of the concepts ‘frame’, ‘framework’, and ‘framing’. Entman explains that “analysis of frames illuminates the precise way in which influence over a human consciousness is exerted by the transfer (or communication) of information from one location - such as a speech, utterance, news report, or novel - to that consciousness” (Entman, 1993, pp. 51-52). According to the author, framing, fundamentally, consists of two key elements: selection and salience. In effect, “to

frame is to select some aspects of the 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” (Entman, 1993, p. 52). The term ‘salience’ means to emphasize a piece of information and make it more “noticeable, meaningful, or memorable to audiences” (1993, p. 53). As Entman explains, such a process increases the likelihood that recipients will perceive the information, comprehend its meaning, and subsequently engage in processing and storing it within memory. Moreover, Entman suggests that framing occurs at four levels: the communicator, the text, the receiver, and the culture. Communicators, such as reporters and editors, make conscious or unconscious decisions on framing in news reports, while the text itself contains frames manifested by the presence or absence of keywords, images, phrases, sources, that thematically reinforces facts or judgments. In turn, the receiver’s thinking and judgement is guided by the frames which may or not contain the ones of the text nor reflect the framing intention of the communicator. Lastly, the culture represents the set of common frames that are exhibited in the discourse and thinking of a social grouping (Entman, 1993, pp. 52-53). Ultimately, Entman describes that framing serves similar purposes in all four settings, involving the deliberate selection and accentuation of specific elements. These highlighted elements are then utilized to construct persuasive arguments that address the nature of the problems, their underlying causes, evaluation, and potential solutions (Entman, 1993, pp. 52-53).

Scheufele (1999) builds on Entman’s idea of framing as a ‘scattered conceptualization’. Consequently, in his article he aimed to explain ‘framing’ as a ‘theory of media effects’. In order to do so, the author was adamant in differentiating ‘framing’ from other related concepts such as ‘agenda-setting’ that had been previously understood far too interrelatedly. Scheufele identifies four key processes in his developed process model of framing: frame building, frame setting, individual-level processes of framing, and a feedback loop from audiences to journalists. Framing is, then, interpreted as “a continuous process where outcomes of certain processes serve as inputs for subsequent processes” (Scheufele, 1999, p. 114). However, he avows for a focus on these elements as opposed to ‘inputs and outcomes’ for future research in order for framing as a theory of media effects to be “conceptualized as a ‘process model’” (Scheufele, 1999, p. 118). The author borrows the terms ‘frame building’ and ‘frame setting’ from agenda setting. The former focuses on the “processes that influence the creation or changes of frames applied by journalists” (p. 115) which vary from

journalist-centered influences to political orientation and external sources of influence such as political actors or interests groups and corporate elites. It, effectively, examines how frames shape societal discourse. The latter can be understood as second level agenda setting and it is “concerned with the salience of issue attributes” (p. 116). Such a process ought to differentiate between ‘salience of frames’ and the ‘perceived importance’ of these. On the one hand, salience of frames refers to those frames most accessible, meaning “most easily available and retrievable from memory”, and on the other hand, the ‘perceived importance of frames’ consists of the “outcome of a more conscious process of information gathering and processing” (p. 116). Scheufele, for instance, criticizes how research on individual-level effects of framing have focused solely on inputs and outcomes, and failed to explain “why and how variables are linked to one another” (p. 117). Lastly, Scheufele draws attention to the ‘final link’ of journalists as audiences which he calls “cognitive misers” as both journalists and their audiences are “equally susceptible to the very frames that they use to describe events and issues” (p. 117). Ultimately, the main conclusion he reaches is that “framing as a theory of media effects needs to be conceptualized as a process model” (p. 118).

Framing, essentially, plays a pivotal role in shaping public perception and opinion, as it directs attention to specific elements of an event or issue through strategic language choices. By employing framing techniques, the media can guide viewers and readers to adopt particular mindsets and influence their stance on a given matter (Cissel, 2012; as cited in Che et. al., 2022). For instance, the Umbrella Revolution in Hong Kong provides a significant context where framing can have a profound impact on the support of Hong Kong citizens for different positions, including the protesters, the government, or neither (Che et. al., 2022). Furthermore, framing also holds implications for the HKNSL, influencing the level of support or opposition toward this legislation on an ongoing basis. Framing encompasses the act of a communication source presenting and defining an issue (Claes, 2015, pp. 51). At its essence, framing is intrinsically linked to the fundamental process of constructing meaning, whereby specific attributes, ideas, themes, or experiences are brought into focus while others are marginalized (Zhou, 2008, p. 119).

The significance of the framing concept resides in its emphasis on the dynamic nature of communicative processes (Claes, 2015, pp. 51). Communication is far from static; instead, it entails the emergence and establishment of frames. Indeed, scholars posit that news frames can also be subject to dynamic framing processes, rather than news content being just static

components (Ping, 2022, p. 1511). ‘Static’ means that news frames serve to connect different semantic elements within a story, offering a cohesive structure (Pan and Kosicki, 1993, p. 59; as cited in Ping 2022). On the other hand, news framing represents a dynamic process that encompasses both frame-building and frame-setting (de Vreese, 2005; as cited in Ping, 2022, p. 1511). The concept of framing holds great significance within the realm of media and journalism. As noted by D’Angelo and Kuypers (2010, p. 1; as cited in Ping, 2022, p. 1511), news stands as the most prominent discursive arena wherein communication researchers strive to comprehend the essence and functioning of framing. Similarly, Chong and Druckman (2007, p. 104; as cited in Ping, 2022, p. 1511) define framing as the process by which individuals form a particular conceptualization of an issue or reorient their thinking regarding it. Hence, news framing, understood as a socio-cognitive process, assumes a critical role in the construction, ultimately, of socio-political reality (Johnson-Cartee, 2005; Tuchman, 1978; as cited in Ping, 2022). Frames exist as integral components of political arguments, journalistic norms, and the discourse of social movements, offering “alternative ways of defining issues, endogenous to the political and social world.” (Claes, 2005, p. 53).

Extensive research has focused on news framing and how it involves the manipulation of reporters and editors by politicians, issue advocates, and other stakeholders to convey their desired meanings through the media (D’Angelo & Kuypers, 2010). Moreover, critical news events have been shown to have the ability to reshape policy debates and serve as opportunities for political elites to influence public policy and mobilize public opinion in alignment with their objectives (Birkland, 1997; Cobb & Elder, 1983; Kingdon, 1984; as cited in Yu, 2015, p. 6). These events, such as military actions, hijackings, assassinations, and natural disasters (Yu, 2015, p.7), can introduce new frames that may differ from or be unrelated to previous ones, potentially altering public opinion on various issues (Schnell & Callaghan, 2004; as cited in Yu, 2015, p.7).

During critical events, the news media assume the role of “massive search engines,” employing dramatic framing techniques to shape the way the audience perceives the issues at hand (Wolsfeld, 2003; as cited in Yu, 2015, p. 8). Particularly in the domain of foreign policy and national security, mainstream news media often rely on high-level government officials to frame critical events, displaying less independence in their framing choices (Lawrence, 2010; as cited in Yu, 2015, p. 8). The National Security legislation of Hong Kong falls under such premises. Yu (2015) argues that journalists may be reluctant to introduce perspectives

that fall outside the established boundaries of what is considered acceptable discourse, as defined by Hallin's notion of the "sphere of legitimate controversy" (Hallin, 1986; as cited in Yu, 2015). This reluctance is particularly evident during times of war, as journalists may fear being perceived as unpatriotic if they question the official position on foreign affairs (Aday, Livingston & Hebert, 2005, as cited in Yu, 2015). Nevertheless, some scholars, such as Entman (2004), argue against privileging the frames and interpretations of those in power, advocating for the provision of sufficient independent information that allows citizens to construct their own alternative frames and perspectives (Entman, 2004).

3.2. Agenda-Setting Theory

Scholars such as McCombs (2001) and colleagues argue that there is, effectively, a convergence of agenda setting and frame setting. And although others, such as Scheufele himself claim the contrary - that they are different concepts, - 'agenda setting theory' has to be examined to better grasp the intricacies of the present theoretical framework.

McCombs and Shaw (2017) explored the concept of agenda setting by investigating the "agenda setting capacity of the mass media" in the US 1968 presidential campaign (p. 106). Their findings were that the media had effectively "exerted a considerable impact on voters' judgements of what they considered the major issues of the campaign" (p. 109). And the media has such power because, ultimately, they are the "major primary sources of national political information; for most, mass media provide the best – and only – easily available approximation of ever-changing political realities" (p. 113). In their study, McCombs, Shaw, and Weaver in 1997, as referenced by Scheufele (1999, p. 103), propose a compelling argument that goes beyond merely establishing a correlation between agenda setting and framing effects. They assert that framing can be seen as an extension of agenda setting, suggesting a strong relationship between the two concepts. The reason is that it acknowledges the media's ability to influence the importance and salience of topics on the public agenda, thereby shaping what the public considers significant, although not necessarily determining their specific thoughts (Lane, 2001; as cited in Yu, 2015, p. 6). As such, when the news media selectively emphasize certain issues and topics while disregarding others, it leads to a phenomenon where the public tends to perceive the highlighted issues as being more significant.

However, other researchers such as Scheufele & Tewksbury (2007; as cited in Yu, 2015) maintain that framing and agenda setting are different concepts. While agenda setting theory emphasizes the perceived importance of issues based on the quantity of media coverage or their salience, framing is primarily concerned with how factual information is presented, shaping the audience's perceptions and interpretations. In other words, audience reactions to issues and events are influenced not only by the amount of media coverage they receive (agenda setting), but also by the specific presentation styles and perspectives employed in framing them (Yu, 2015).

3.3. Ideological News Framing

Given the irreconcilable views that Hong Kong's democracy movement and the PRC, and by extent the HKSAR government, have on freedom of press, it seems evident that 'ideology' plays a crucial role in the theoretical framework of the present thesis. Ideological news framing ought to be explored as the ideologies of the newspapers selected thoroughly differentiate from each other, hence, the framing that each may implement inevitably be influenced by the ideology they ascribe to and diffuse through their news.

As cited in Du et. al. (2018, p. 2558), McQuail (1992) highlights that no news system can claim to be completely non ideological, apolitical, or nonpartisan, leading to observable differences in news coverage. Hence, ideology, regarded as a symbolic mechanism that fosters cohesion and integration within society, plays a crucial role in shaping news production as argued by Shoemaker & Reese (1996). Indeed, Shoemaker and Reese (1996) note that regardless of whether media ownership is predominantly private or government-controlled, governments exert control through laws, regulations, licenses, taxes, and financial mechanisms. Athusser (1971, as cited in Du et. al., 2018, p. 2558) reinforces such a point by asserting that ideology is produced and reproduced through various state apparatuses, including the news media. Likewise, Akhavan-Majid and Ramaprasad (1998; as cited in Du et. al., 2018, p. 2558) argue that ideology serves as a significant source of news framing, as media selectively choose and structure content to transmit ideology. In the realm of news work, particularly in the context of international news coverage, the dominant ideology of a nation, whether capitalist, communist, democratic, or authoritarian, emerges as a primary influencer of framing choices (Akhavan-Majid & Ramaprasad, 1998; as cited in Du et. al., 2018, p. 2558).

Guofeng Wang & Xueqin Ma (2021) also delve on the role that ideology plays in news framing. Certainly, as referenced in their work, Reisigl & Wodak, (2009, p. 88) describe ideology as a crucial concept in critical discourse studies that, effectively, refers to a particular perspective characterized by shared mental representations, convictions, opinions, attitudes, and evaluations within a specific community. In the process of delivering information to the audience, news discourse inevitably carries varying degrees of ideological influence (Wang & Ma, 2021, p. 88). This is due not only to the journalist's incorporation of their "mental models" (Van Dijk, 1988; as cited in Wang & Ma, 2021, p. 88), which encompass their cognitive representations of subjective participant experiences, but also because journalists, as members of a particular community within a society, are influenced by the dominant ideology prevalent within that community. Wang and Ma draw attention to Fairclough (2015, p. 64; as cited in Wang & Ma, 2021, p. 88) who points out, the dominant ideology in a society is often rooted in the naturalization of practices within the dominant class or bloc, which are perceived as universal or commonsensical. Consequently, when journalists narrate news stories about events, they naturally construct a "social reality" (involving social actions, relations, and identities) consistent with the prevailing perceptions in society (Wang & Ma, 2021, p. 88).

The generation and dissemination of news reports, including those covering events like the Hong Kong protests, involve a complex process of mediating, shaping, consolidating, and standardizing public perceptions of specific social issues (Wang & Ma, 2021, p. 89). The formation of news discourse is influenced by the prevailing ideology within a given society, and the dissemination of this discourse serves to reinforce and uphold the existing dominant ideology through various means. On a broader scale, the dominant ideology interacts with the overall social practices within a society, at an intermediate level it influences the framing of news stories, and at a more granular level, it impacts the language utilized in news discourse (Wang & Ma, 2021, p. 89). When examining the context of the HNSL, understanding the role of dominant ideology becomes particularly pertinent. The HNSL has sparked intense debates and protests in Hong Kong. News reports on the HNSL undergo a similar process of formation and dissemination, which carries the potential to influence public perceptions and opinions regarding this significant legislative development. The framing, language use, and overall presentation of news discourse on the HNSL can contribute to either legitimizing or contesting the dominant ideology behind the law. Therefore, analyzing the formation and dissemination of news reports on the HNSL within the framework of dominant ideology

provides valuable insights into the construction and influence of public understanding and perceptions surrounding the socio-political issue.

On the other hand, Du, Zhu and Yang (2018) give account of, Siebert, Peterson, and Schramm's (1956) "typology of the press" initially categorized media systems worldwide into four types: authoritarian, libertarian, communist, and social responsibility (Du et. al., 2018, p. 2559). Building upon this framework, Du et. al. reference Hachten and Scotton's (2007) five distinct concepts for media systems at the country level. Among these concepts, the Western model values the media's right to report, comment, and criticize the government without fear of reprisal, exemplified by countries like the United States and the United Kingdom (Du et. al., 2018, p. 2559). In contrast, the communist media system emphasizes the press serving society by promoting desired norms, transmitting official views, and benefiting the ruling party rather than the public, as seen in countries like China, Cuba, and North Korea (Du et. al., 2018, p. 2559). Likewise, Hallin and Mancini (2004) conducted an examination of the Western press and identified three primary models: the polarized media model, the democratic corporatist model, and the liberal model. The last one emphasizes high newspaper circulation, press freedom, and weak ties to political parties. Journalism in this model is characterized by professionalism, an information-oriented focus, and a stronger influence of commercial factors over political influences, as exemplified by the media system in the United States.

In countries following the polarized model, journalists exhibit greater reliance on political elites compared to the liberal model. The democratic corporatist model combines robust commercial media with politically affiliated media, with the British press occupying a position between the two models due to its strong public broadcasting system and a national newspaper landscape influenced by partisan orientations (Hallin & Mancini, 2004).

It is widely recognized that the news media in mainland China are subject to strict ideological control by the CCP, serving as an ideological apparatus and the government's "mouthpiece" for communication. The CCP and the government assert their influence over both party-owned media and mass appeal-based media, directing their operations. Consequently, Chinese journalists often present different narratives compared to their counterparts in Western media systems when covering the same events (Du et. al., 2018, p. 2559).

In contrast, Hong Kong, as has been already introduced, enjoys a greater degree of press freedom, shaped by its history of British colonial governance, embrace of capitalism, and development of a mature market economy that highly values the free flow of information. Despite coming under Communist China's rule, Hong Kong operates under the "one country, two systems" policy, designed to maintain the region's autonomy. Within this political framework, the press in Hong Kong is expected to continue operating according to Western normative concepts, facilitating the unrestricted dissemination of information (Du et. al., 2018, p. 2559). However, the NSL provides sufficient leeway for the Hong Kong media system to drastically change and fall under the restrictive nature of the Chinese media system.

IV. Hypothesis and Research Question

This thesis hypothesizes that *People's Daily* will most likely frame the HKNSL positively as means of safeguarding citizens rights from threats against both Hong Kong's and PRC's national security, thereby granting a 'safeguard' of the PRC's, and by extent the CCP's, rule of law and legitimacy. On the other hand, a sub hypothesis would also preface that *People's Daily* would be less likely to talk about the piece of legislation, namely the negative effects that it had and the national security crackdown. Being a pro-establishment newspaper, it would be less likely to report on anything that would not look favorable to the government, and if it did report it would frame such events in a way that still seems in the party's favor. Furthermore, being under a Chinese corporation, the newspaper is more likely to frame the law according to how the government would.

Conversely, *HKFP* represents the other end of the spectrum. The newspaper launched in 2015 "amid rising concerns over declining press freedom in Hong Kong" (HKFP, n.d.). In 2021, it was nominated for a Nobel Peace Prize and it declares itself as an independent newspaper with "an impartial stance, transparent funding, and balanced coverage guided by an Ethics Code and Corrections Policy" (HKFP, n.d.). Thus, it seems evident that *HKFP* would frame the NSL negatively as a violation of HongKongers human rights, precisely freedom of press and speech. As a pan-democracy newspaper it is more likely that the articles are more adamant about the negative effects of the law, covering the crackdown and the people, newspapers, or companies that have negatively been impacted by it.

Lastly, in order to have a rather more neutral stance, foreign to a certain degree to the socio-political issue, *The Guardian* will also be critiqued. Despite being somewhat an external

source of news, this thesis considers a British newspaper greatly telling in the context of anything that affects Hong Kong as a former British colony. It should be noted that under British rule, HongKongers enjoyed a number of rights as did the British citizens. And, effectively, such rights and further autonomy were supposedly to be extended in the Handover until 2047. Therefore, this dissertation hypothesizes that articles from *The Guardian* are also more likely to frame the law negatively, albeit not being as adamant in the covering of the law and the frames as *HKFP*. As a democracy, it seems evident that the frames used would fall according to that ideological line, thence, pan-democracy and not pro-establishment or pro-PRC.

The hypothesis and research question that this thesis sets forth can be encapsulated in the following premises:

H1: Pro-establishment newspapers - *People's Daily* - are more likely to frame the Hong Kong National Security Law positively as a means to safeguard and guarantee rights, while pan-democracy newspapers - *HKFP* - are more likely to frame it negatively as a violation of human rights. British newspapers are likely to frame similarly to Hong Kong pan-democracy newspapers, although remaining more neutral on the issue.

RQ: How do different newspapers - *People's Daily*, *HKFP*, and *The Guardian* - frame the Hong Kong National Security Law in their coverage, and how does this construction vary based on their political stance?

V. Methodology

Drawing from the previous research and within the theoretical framework the present thesis aims to answer and draw conclusions from a main hypothesis and research question. These carefully fall under the premises established by previous work that has not only hypothesized in a similar manner as does this dissertation, but furthermore, they have validated and confirmed such hypotheses. The ultimate analysis of the selected articles from the newspapers is effectively based on qualitative discourse analysis derived from the framing of the law. Persistently, the selection of newspapers from which articles will be drawn to be analyzed and coded has a particular and pertinent reason and explanation. Effectively, in order to distinguish the framing processes that have been carried out in the articles, newspapers with very different - almost irreconcilable - views, ergo ideologies, have been selected. As has previously been discussed in

the Purposes and Motives, these include *People's Daily*, *Hong Kong Free Press* and *The Guardian*.

Due to the limitations of language and the restrictions put in place precisely due to the NSL, other newspapers such as *Wen Wei Po* - a PRC-owned newspaper based from Hong Kong and, evidently, pro-Beijing -, or *Apple Daily* - the epitome newspaper of the democracy movement that shut down because of Beijing-led repression and the HKNSL - are not object of this study. In lieu, *People's Daily* and *HKFP* have been chosen as equivalents to the latter two because they hold similar views respectively, thereby ensuring that similar framing processes, hence, results will be obtained. The articles of the newspapers to be critiqued were taken from the own search engines of the newspapers. Moreover, the three newspapers were handpicked instead of others renowned such as *China's Daily* and *South China Morning Post*. For the purpose of this dissertation, *People's Daily*, *HKFP*, and *The Guardian* seemed more representative and pertinent to the thesis subject, motives, hypothesis and research questions. As has been noted in the Purpose and Motives, this thesis directs the attention to frames regarding 'human rights', consequently, the articles reviewed will touch on such concept.

5.1. Sampling

The sample of data for this study was primarily collected through the own search engines and archives of the three newspapers. Taking into account that the search engine provided by *The Guardian* is supported by the Google tool of Advanced Search, this tool was utilized also to select the sample of articles of the other two newspapers, especially *HKFP* as its search engine is more limited than the rest. The sample that was collected from *People's Daily* was mainly drawn from its own advanced search engine, albeit being supported by Google Advanced Search engine. Data was collected by introducing in the search engine the keyword "Hong Kong National Security Law" in each newspaper source. Moreover, as 'human rights' are pertaining to the present hypothesis, the search also included the keyword "rights" or "human rights" to be included in the text of the article. By using Google's Advanced Search engine, the cue <National Security Law "national security law" "Hong Kong" site:hongkongfp.com"> (with the respective newspapers) was introduced. The keyword "human rights" was later added to the search. To have a manageable sample of data a time range was applied from 30 May 2020 to 30 July 2020, a period equivalent to one month before and after the enactment of HKNSL on June 30th 2020. Then, the sample was reviewed to manually eliminate repeated items or items that did not fit into

the prerequisites set in the search. The final sample of articles was 41 from *People's Daily* (36.963%), 37 from *HKFP* (33.3%), and 33 from *The Guardian* (29.729%).

5.2. Coding

The coding unit was each of the articles which were given a numerical value in the coding frameworks. These categories were partly reproduced based on the frameworks of Du, Y., Zhu, L., & Yang, F. (2018) and Che, M., Hall, N., & Taylor, D. (2021)'s studies. These studies analyzed the framing of Occupy Central and the Anti-Extradition Bill Movement, respectively, yet their frameworks were imitable and provided evidence to H1 and RQ. Given the limitations of the study, a numerical system was selected for coding as it allows for a finer-grained analysis of the articles, more nuances - reflection of the degree to which the article is positive or negative towards the category -, and greater comparability between articles. The analysis carried out through coding is, ultimately, a qualitative discourse analysis. Moreover, as the study has only one coder, specific sub-categories needed to be advanced for some categories so next coders would be able to accurately and consistently give the same value to the sample in a systematic way. These subcategories include words that would be present in the articles or other words with the same meaning.

5.3. Categories

Bellow are the frameworks/categories used:

Judgmental Headline: whether headlines of articles related to the Hong Kong National Security Law contain judgmental words and, if so, the degree of their presence. In order to better identify judgmental words, these subcategories were used:

1. Accusatory language: This type of language assigns blame or responsibility to a particular group or individual, such as using words like “condemns” or “blames.”
2. Value-laden language: This type of language reflects the author’s standpoint, such as using words like “righteous” or “immoral”, “wrong” or “right.”
3. Loaded words: This type of language uses words with strong emotional connotations to convey a particular meaning or message, such as using words like “oppression”, “resistance,” “fight”, “abuse”, “strangle”, or “defiance.”

The use of these subcategories served to give a value to the category as a whole. A score of 0 indicates the absence of any judgmental words in the headline, meaning none of the subcategories appeared. A score of 1 indicates the presence of mild judgmental words that may indicate a subtle bias or opinion, hence that the headline included words from 1 or 2 of the subcategories. Lastly, a score of 2 indicates a significant presence of judgmental words that are likely to have a strong impact on the reader's perception of the issue. This would entail having the 3 subcategories in the headline.

News Perspective: aims to capture the overall tone of the article with respect to the government.

A score of 0 would indicate a neutral perspective, with the article presenting both sides of the issue without taking a clear position in favor of one or the other. This may include articles that report on events without expressing a strong opinion, or articles that provide a balanced view of the different perspectives. Subcategories would include words such as: "event", "situation", "issue", "developments", "discussions", "dialogue", "debate", "controversy".

A score of 1 in this category would indicate that the article is pro-government/pro-establishment, meaning that the article supports the Hong Kong's government or the PRC's stance. The subcategories are: Defense of government actions supportive stance (words such as "supports", "justifies", "legitimacy", "improvement"); opposition to foreign interference ("internal affairs", "foreign interference", "foreign forces" "sanctions", "national sovereignty"); portraying protests or dissent as disruptive ("rioters", "disruptors", "criminals"); questioning the intentions or credibility of critics ("conspiracy", "discredits", "double standards", "western bias").

A score of 2 would indicate that the article is anti-government, with criticism or negative language directed at the Hong Kong government or its policies. This may include articles that are critical of the government's handling of the protests, or that question the government's commitment to protecting civil liberties and the rule of law. Subcategories: "authoritarian", "oppressive", "repressive", "suppression", "censorship", "violations", "abuse", "dictatorship", "failure".

Support for National Security Law: whether an article is supportive or critical of the HKNSL.

A score of 1 is assigned to articles that explicitly or implicitly endorse the law, by praising its benefits, supporting the Chinese government's stance on Hong Kong, or defending the law against critics. For example, an article might argue that the law is necessary to restore stability and security in Hong Kong or that it will benefit the region's economic development.

On the other hand, articles that are critical of or opposed to the law are coded as 2. Such articles might criticize the 'opaqueness' of the law, the 'threats' it entails or how it did not allow for citizens to be aware of its enactment. They may also criticize the Chinese government's role in imposing the law on Hong Kong or question the legitimacy of the law itself. Mentioning that the law is a violation of human rights and liberties as well as of Hong Kong's autonomy might also count, although such elements are coded in other categories.

Articles that do not take a stance on the NSL, but rather provide a factual or descriptive account of the law without expressing support or opposition, would be coded as neutral = 0. This could include articles that simply report on the enactment of the law, provide a summary of its provisions, or offer a historical or political context for the law's introduction.

Government Actions.

Articles that do not discuss or analyze the government's actions in response to the NSL would be assigned a score of 0. Articles that discuss or analyze the government's actions to safeguard national security and enforce the NSL in a conciliatory manner or as merely judicial cooperation and simply enforcing the law, would be assigned a score of 1. Articles that discuss or analyze the government's actions in enforcing the NSL using a more strict, even violent, repression, such as making mass arrests, censoring and suppressing free speech and press, and using excessive force against protesters, would be assigned a score of 2.

The Human Rights Violations.

An article that is coded as 0 in this category may not mention or discuss human rights violations related to the NSL. This could occur if the article focuses on other aspects of the law, such as its economic or political impact, without addressing the impact on human rights or civil liberties and freedoms.

Articles that are adamant that the HKNSL safeguards the rights of citizens and protects them from national security threats are coded as 1. In contrast, an article that is coded as 2 reports

on how the NSL may undermine and violate human rights, civil liberties and freedoms, such as freedom of speech or press.

Impact on HKSAR. This category assesses the impact of the NSL on the Hong Kong Special Administrative Region (SAR), particularly the autonomy of the territory, in light of the One Country Two Systems framework.

On the other hand, articles that do not engage with the issue of Hong Kong's autonomy in relation to the NSL would be coded as 0. Articles are coded 1 if they report on the positive impacts that the law has on the security of Hong Kong and that law still grants autonomy, albeit affirming that "HKSAR is an inalienable part of the PRC", or that discuss that the NSL will not have any negative effects. Articles are coded 2 if they discuss the negative impacts that the NSL has had on HKSAR's autonomy such as the ability to maintain an independent legal system or to protect the freedom of the press. Alluding that the passing of the law means the "end of Hong Kong" will also be coded as 2.

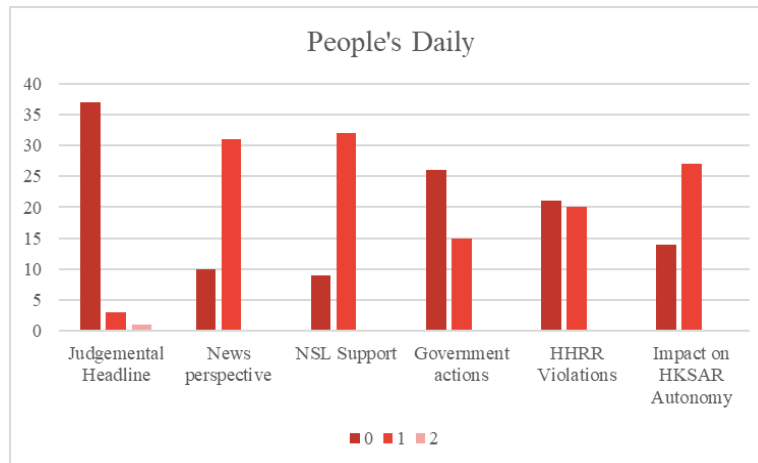
VI. Results

Once the articles have been carefully reviewed and assigned a value/score, thereby, coded, the results obtained are subjected to an analysis and further discussion that is pertinent both to each newspaper on its own, and also a comparison amongst the three.

6.1. Overview of the data and descriptive statistics

A. People's Daily Articles

People's Daily carries the biggest sample of articles. The reason being that as a mouthpiece of the government, the Chinese newspaper has a slightly different format than the other two. The articles published by *People's Daily* consist of compilation of statements by high officials or authorities such as ambassadors, members of Committees and so on. Having said that, any statement that is published is considered to be ideologically aligned with the newspaper. Thus, even if the article is citing an official, the newspaper carried the same standpoint. The aim of the newspaper is to inform citizens of the development of policies or events, only in accordance with the central view - that of the central government.



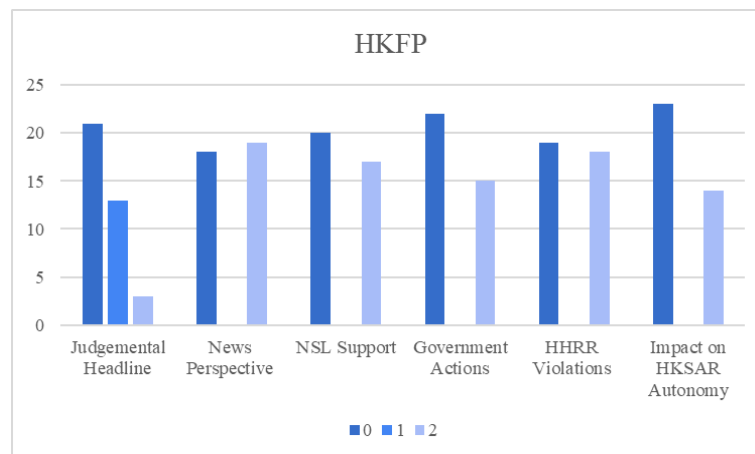
Source: author's own elaboration (2023).

An overview of the results signals that the great majority of newspapers - 77.5%¹ - have a pro-establishment news perspective stating that ‘foreign critics of the government are an interference in China’s and HKSAR’s internal affairs’ (they were coded as 1). The articles framed activists as “‘Hong Kong independence” forces’, ‘radical separatist forces’, ‘black-clad rioters’, and/or ‘home-grown terrorists’. None held views contrary to the government, as expected, nor were pro-democracy. And the ones which were coded as 0 maintained rather objective views. Consistently, none of the articles criticized the NSL. Instead, 78.5% were supportive of the piece of legislation and among them 48.8% mentioned that the law ‘protected human rights’ or that it does not ‘affect the rights and freedoms’ of citizens of Hong Kong. No article mentioned that the law represented a ‘violation of human rights’. Subsequently, 65.9% of articles stated that the law brings ‘stability and prosperity’ to Hong Kong and ensures the proper implementation of the ‘One Country, Two Systems’ Framework. They argued that the law will not bring about change to Hong Kong nor affect the framework, but rather ‘enhances the legal framework and mechanism for Hong Kong residents to exercise their statutory rights and freedom’. Lastly, with regards to *government actions* 36.6% mentioned that the government established dialogue with the population and the police only carried its obligations according to the law. There was only one article that criticize the local government stating that “the local government has constantly failed to undertake any initiative to decolonize Hong Kong in the face of riots, sabotage, violence, anarchy, and vandalism caused by the agents, pawns, and proteges of the Western imperium, especially the United States (US)” (Hassan, 2020). Almost none of the articles had judgemental headlines.

¹ Percentages are rounded up.

B. HKFP Articles

HKFP's sample consisted of extensive articles that varied between objective more simple briefings and news articles to more elaborate opinion articles. Thus, the sample was relatively smaller as it contained longer reads both citing sources as well as stating the opinion of the author. The sampling of *HKFP*'s articles had to be extended with the Factiva Database as the selection obtained through Google Advanced Search tool was significantly smaller than the other two newspapers.



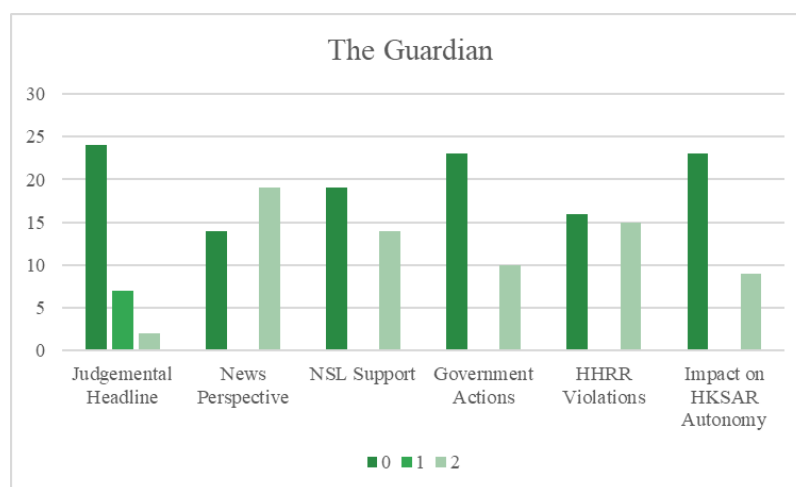
Source: author's own elaboration (2023).

The results show that 35.2% of articles had a judgemental headline with 16.2% being highly judgemental with titles such as “For a terrifying glimpse into Hong Kong’s future, look at how China abuses its own national security law” (Wetzel, 2020) or “Year of repression: How Hong Kong’s leaders twisted the protest narrative to strangle a movement” (Rosenzweig, 2020). Of the 37 articles 51.4% were strongly positioned in news perspectives as highly anti-government and very pro-democracy. The remaining percentage simply informed about both Chinese sources as well as Hong Kong and more western sources. These refrain from exhibiting a clear news perspective or ideology, but rather were objective and informed on all the matters relevant to the events. However, none of the articles were pro-establishment nor pro-government. 45.9% of articles were explicitly against the NSL and did not support it, they either criticized aspects of the law or talked about the negative effects that it had. Accordingly, 48.6% of articles were adamant that the NSL represents a ‘violation of human rights’. For instance, one article wrote: “this is Beijing’s most breathtaking, threatening and callous attack yet on the enjoyment of human rights in the city” (Wetzel, 2020); another said that “The breathtaking ruthlessness of the national security law sent a jolt through the pro-democracy movement, but it is merely the latest escalation in a sustained attack on

human rights in Hong Kong” (Rosenzweig, 2020). Moreover, the results are consistent with regards to the impact that the law has on HKSAR, namely its autonomy, with 37.8% of articles alluding to an ‘end of Hong Kong’ or the ‘death of Hong Kong’. And 40.5% of the articles mentioned repressive government actions citing censorship or excessive police power. Although the percentages may seem low, it must be underscored that none of the categories, aside from *judgemental headlines*, were coded as 1, meaning that none of the articles were scored as the ones from *People’s Daily*. The reason for a lower percentage is that a lot of *HKFP* articles remained objective and simply informed on the categories.

C. The Guardian Articles

The sample of articles from *The Guardian* followed a similar pattern to that of *HKFP*. Nonetheless, being a newspaper not based on Hong Kong or China, but on the UK, the results were expected to be rather more objective. Still, as a newspaper from the former foreign ruler of Hong Kong and a western democracy, the articles were also expected to not score as *People’s Daily* ones. Similarly to *HKFP*, *The Guardian* articles consisted of both opinion pieces and, especially, informative news articles.



Source: author’s own elaboration (2023).

The overview of the results from *The Guardian* shows that 21.2% of articles had a slightly judgemental headline and 12.1% had a highly judgemental headline. A total of 57.6% of articles were anti-government/anti-establishment, meaning that their democratic news perspective was clear throughout the article, qualifying the government as ‘draconian’, ‘repressive’ and ‘authoritarian’. Persistently, 42.42% were critical of the law and did not support the legislative piece. 45.45% of articles held the view that the NSL was a ‘violation of human rights’ and that it ‘strips Hong Kong of its traditional freedoms’. Similarly, 27.27%

indicated that the NSL affected Hong Kong's autonomy, citing that it meant an effective ending of the 'One Country, Two Systems' framework and that the law meant a "devastating blow to Hong Kong's autonomy" as promised under such a framework. Lastly, a percentage of 30.30 mentioned repressive government actions towards journalists, activists, and so on.

VII. Discussion

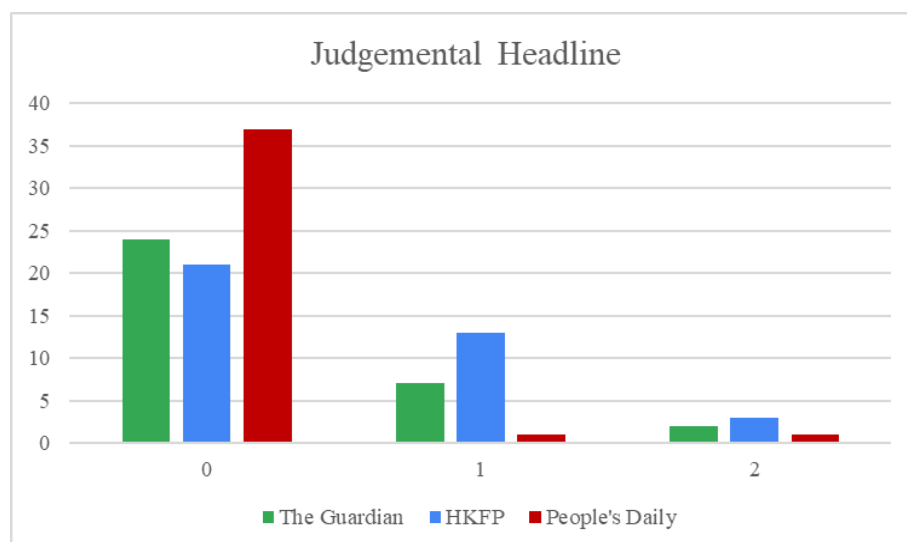
Upon such an outline of results obtained from the articles coded, this dissertation will also further discuss and compare the analysis in order to grasp greater intricacies in the difference in framing amongst the newspapers.

In their 2022 Annual Report, *HKFP* gave account that in 2022 they received 15 million pageviews and, supported by Google Analytics tool, the newspaper also reported that 43% of *HKFP* readers were Hong Kong-based, while 16% were US-based (Hong Kong Free Press, 2022). Additionally, 84% of *HKFP* readers use English as a first language (Hong Kong Free Press, 2022). The newspaper establishes itself as a completely independent news source. Contrastingly, *People's Daily* defines itself as "an important resource and vehicle for the CPC in national governance" (People's Daily, 2020). The pro-Beijing newspaper reports to have around 563 million readers on different platforms and formats including website and social media and it publishes its news in 7 ethnic and 12 foreign languages in addition to Chinese (People's Daily, n.d.). Lastly, *The Guardian* asserts itself as a "a global news organization that delivers fearless, investigative journalism - giving a voice to the powerless and holding power to account" (The Guardian, n.d.). Based on the 2021 figures provided by PAMCo, the audience measurement company for publishers, *The Guardian* boasted a monthly print readership of 3.2 million and a monthly digital readership of 18.4 million (Media Studies, 2023). It also has 4,5 million browsers in Asia each month on average (Media Studies, 2023).

Based on the rundown of the different statistics of the newspapers, it seems reasonable to note that the framing of each will have different effects not only because of the discourses utilized but also based on their reach and audience. *People's Daily* being an official communication platform of the CCP, is more likely to be read only by those whose ideology falls more in line with the party and the government. Critics of the government might also read the newspaper, but they will not be subjected to any form of framing that it implements in its articles. The largest source of audience that *People's Daily* receives will be based on

mainland China, where the government is careful not to have any dissent spill over from Hong Kong. On the other hand, with regards to *HKFP*, the framing of the news pertaining to the NSL will be Hong Kongers or foreign readers from western countries. *The Guardian*, will most likely have the same effect, as a UK-based newspaper, the framing will influence English readers as well as other foreigners from countries alike the UK, but also Hong Kongers if we consider that as a former British colony, the UK still holds value for the ‘Pearl of Asia’.

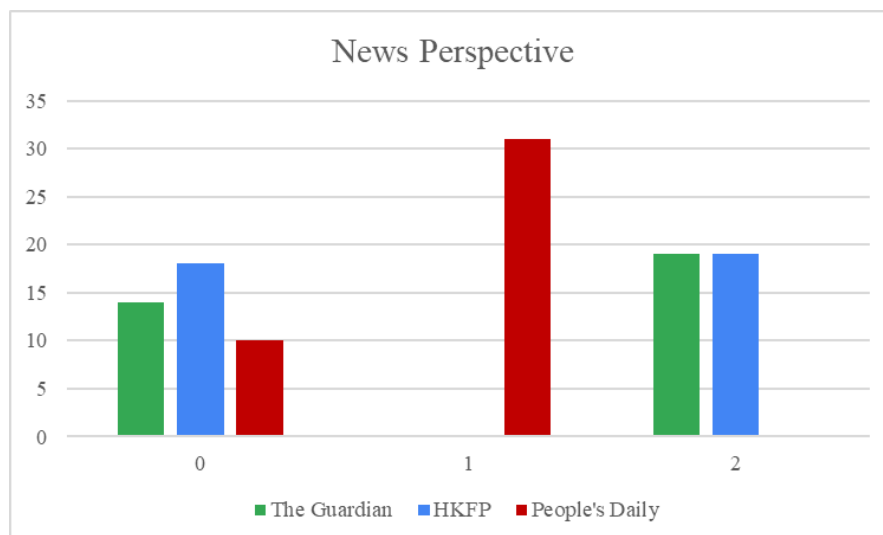
Effectively, when comparing the results from each category the differences in framing reveal how each audience understands and interprets the law. As for the ‘judgemental headline’ category, *HKFP* was the newspaper with most judgemental headlines (35.2%, and 16.2% being highly judgemental, meaning they were coded as 2). *The Guardian* followed with 33.3% of articles having a judgemental headline. And *People’s Daily* was the newspaper with least judgemental headlines (90.3%). The analysis that can be drawn is that due to the character and nature of *People’s Daily*, it seems plausible that it would refrain from having more judgemental headlines as they would influence the image both of the party and the newspaper itself. In contrast, *HKFP* as well as *The Guardian* due to their independent nature and transparency with the readers, the headlines of the articles may be at times more judgemental rather than objective. The opinion pieces of these two newspapers are key in this aspect.



Source: author’s own elaboration (2023).

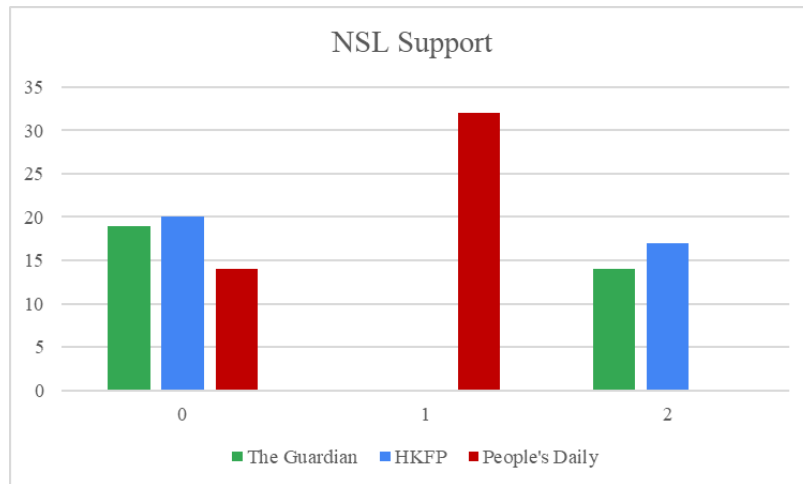
The news perspectives of the articles of each newspaper are relevant to the subject matter because they relate, to an extent, to the inherent ideological nature of news gathering as has

been alluded to in the Theoretical Framework of this thesis. *People's Daily* is clearly pro-establishment and pro-Beijing as a mouthpiece of the CCP. Thus, 77.5% of the articles sampled were coded 1 in news perspective, that is, to be pro-government as they legitimize and justify the policies taken while, namely, criticizing any 'foreign interference'. On the other side of the spectrum, nonetheless, both *HKFP* and *The Guardian* had anti-PRC perspectives which fundamentally obeys the nature of the newspapers as set out by themselves. They avow democratic and independent principles. *People's Daily*, as the only government-led newspaper, ultimately, disseminates the PRC's ideology through its news. It, effectively, produces and reproduces CCP ideology. And although the news media is also capable of such, it is through *People's Daily* news gathering that the PRC exerts control over the population, but namely and pertinent to the subject of the dissertation, over Hong Kong and the reaction to the NSL.



Source: author's own elaboration (2023).

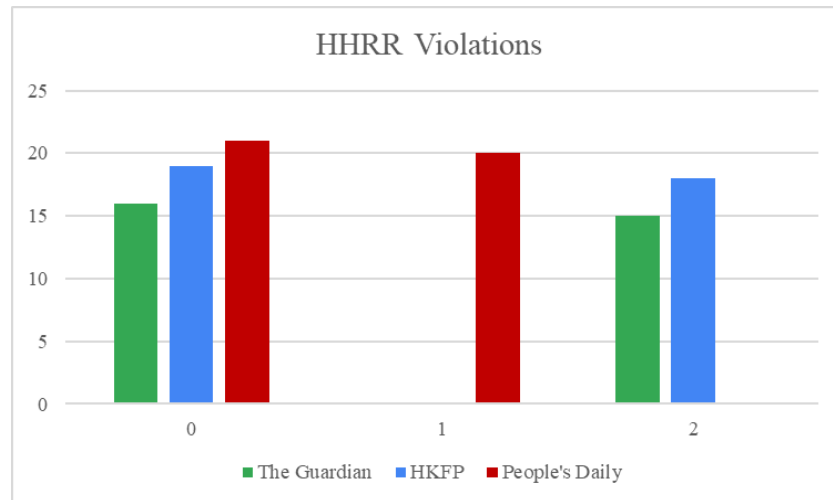
As for the HKNSL, the results are consistent vis-à-vis the news perspectives of the articles. *People's Daily* had 78.5% of articles that were supportive of the law, which falls in line with the PRC ideology and the news perspectives of its articles. Conversely, both *HKFP* and *The Guardian* were critical of the law and did not support it either because it represented a violation of Hong Kong's freedoms and rights or because it was too 'opaque' and easily controlled by the PRC (45.9% and 42.42%, respectively). Such results are consistent with the background on the law as well as with previous similar studies conducted on Hong Kong. The minority of articles from the three newspapers remained objective and informative on the law.



Source: author's own elaboration (2023).

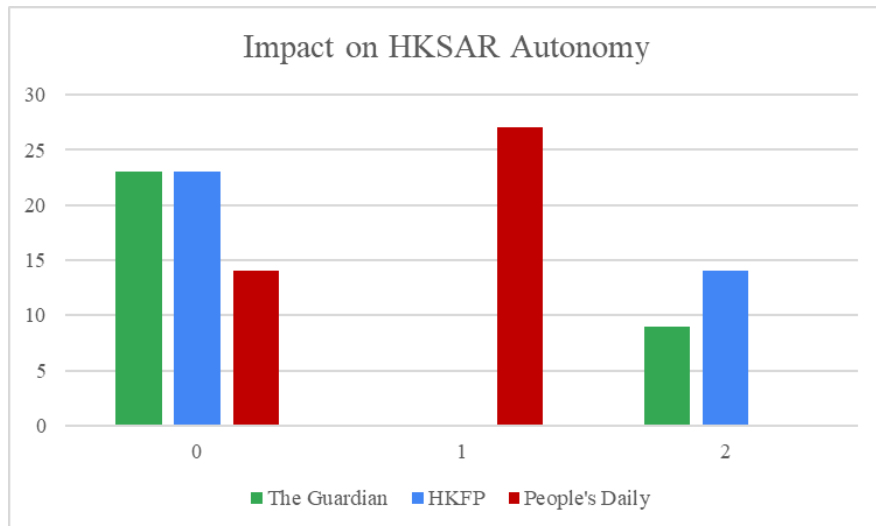
Furthermore, in light of the support for the NSL, it is essential to examine whether the newspapers portray the NSL as a violation of human rights or as a protection of human rights. As preconditioned by the categories above, *People's Daily* differs completely from *HKFP* and *The Guardian*, both of which hold similar views on this regard. It appears evident that the former would frame the law as a necessary protection of human rights both from external forces and from the activists that featured the protests in Hong Kong. Conversely, the latter two frame the law as a violation of rights and the freedoms enjoyed in Hong Kong. From the ideological perspective of these two newspapers it is logical that a law that suppresses freedom of speech and press represents a violation of human rights. Likewise, it would be atypical for the official communication platform of the PRC to express criticism towards a legislation that the government has endorsed and has been directly involved in enacting and implementing. Thus, 48.6% of articles from *HKFP* framed the law as a 'violation of human rights' as did 45.45% of *The Guardian* articles. A similar percentage, 48.8%, of the *People's Daily* held the exact opposite view and framed the law as a 'protection of human rights'. The remaining percentage of the articles were coded as 0. The reason varies depending on the newspaper. For *People's Daily*, it can be inferred that as the newspaper of an authoritative regime facing growing international criticism regarding its handling of human rights issues - such as those pertaining to Xinjiang Uyghurs, Hong Kong, or Taiwan -, it is less inclined to address human rights matters altogether. With regards to *HKFP* it can be posited that the HKNSL can, ultimately, have an effect and influence on what the newspaper publishes or how it frames certain events. Hence, in order to continue afloat, the Hong Kong newspaper might refrain from taking a clear stance against the government and adopt to simply inform objectively on the law. And, lastly, the international nature of *The Guardian* and the fact that

it is, inevitably, an outside news source, it is likely to have a broader range of events from which to choose when reporting the news.



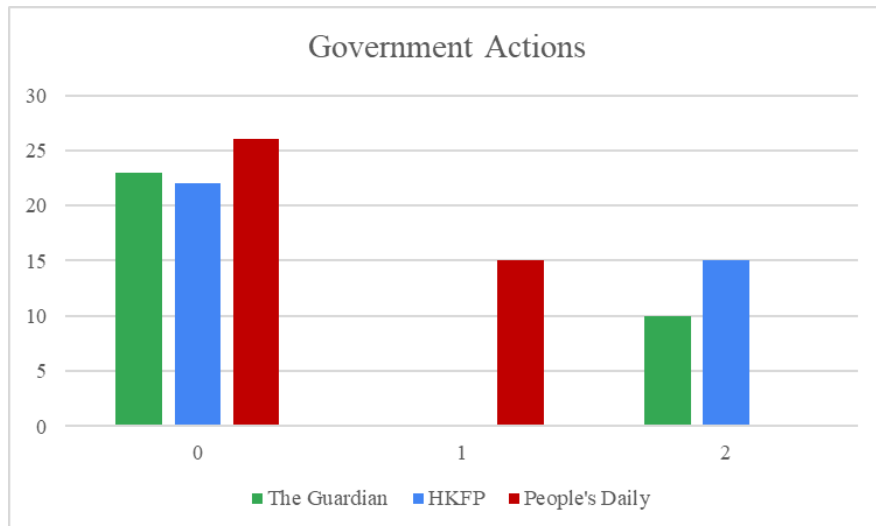
Source: author's own elaboration (2023).

A similar framing process applies to whether or not the articles mention the impact that the law may have on HKSAR, namely its autonomy, and how they frame such effects. However, the frequency of the impact being mentioned is smaller than with regards to the HHRR violations. Consistent with the results on the categories of 'NSL Support' and 'HHRR violations', *People's Daily* frames the NSL as a necessary step towards stability in Hong Kong. Thus, 65.9% of the articles stated that the NSL would not affect HKSAR negatively under the framework of 'One Country, Two Systems', but rather that it would further enhance it and ensure its implementation. This view was only held by *People's Daily*. Once again, both *HKFP* and *The Guardian* framed the law similarly. The majority of articles from *HKFP* and *The Guardian* were coded as 0, meaning that they did not take a clear stance on the impact on HKSAR or that they simply did not report on the matter. 37.8% and 27.27%, respectively, did frame the law as an 'end' or 'death' to Hong Kong's autonomy and unique nature.



Source: author's own elaboration (2023).

Lastly, the newspapers also differed in the framing of government actions. These had to be differentiated between the actions taken by the police during the months of unrest due to the Hong Kong marches and protests, and the actions following the enactment of the law. *People's Daily* framed activists as 'rioters', 'criminals', 'terrorists', and 'radicals'. Such frames are persistent with the newspaper's news perspective as it aligns with the party's ideology. Nonetheless, in the case of the NSL, the pro-China paper framed the government actions as cooperative, maintaining dialogue with the citizens of Hong Kong (36.6%). The only allusion to the activists and unrest was made as a justification for the law to be properly enacted as means of ensuring stability and security. The government was, in turn, framed as a protector of Hong Kongers. Hence, *People's Daily* stated that only a small fraction of the population - those considered 'rioters' and so forth - would be subject to the law. However, it should be noted that as *People's Daily* is a CCP and PRC-led newspaper its ideology and stance is mainly with regards to the central government. That is why there was one article whereby the actions of the local government were criticized, not because of its repressive measures, but rather because of its failure to prevent unrest and instability in HKSAR. At the other end, the other two papers framed the government actions as repressive and authoritative with frequent references to 'censorship' and excessive use of police force (40.5% and 30.30% respectively).



Source: author's own elaboration (2023).

Notably, as was mentioned in the Introduction to this dissertation, the enactment of the law coincided with the anniversary of the July 2nd, 1997 Handover, and the commemoration of the June 4th, 1989 Tiananmen Square Massacre. The Tiananmen incident holds significant value for the democracy movement in both Hong Kong and China. The repression by the central government on June 4th is pertinent to the category of 'Government actions' because it allows for greater analysis and unraveling of the framing process. Among the total sample of *HKFP* articles, 10.8% mentioned the Tiananmen vigil and how the government had suspended and prohibited the commemoration for COVID-19 reasons. A total of 6.6% of *The Guardian* articles also made reference to this event. Nonetheless, none of the articles by *People's Daily* mentioned Tiananmen or its anniversary. Indeed, it is atypical for the government to make remembrance of Tiananmen. Instead, certain articles mentioned the 2020 anniversary of the Handover from which Hong Kong had been returned from foreign forces. These two events, ultimately, illustrate the consistency of the framing process of the three newspapers and how they remained persistent throughout the categories. The comparison has, thus, assisted in proving the validity of the hypothesis and research questions set forth.

VIII. Conclusion

This thesis has validated and confirmed the hypothesis presented and answered the research questions proposed. The dissertation has reached the main conclusion that, ultimately, the HKNSL was framed positively by *People's Daily*, a pro-establishment

newspaper, and negatively by *HKFP* - a pan-democracy newspaper - and *The Guardian* - international and towards the pan-democracy camp -. Such contention has been raised in the rationale of the present thesis, and thus, the hypothesis. Through a content analysis carried out by sampling and coding, the dissertation finds that, indeed, and according to the hypothesis, different news frames were used by the different newspapers with regards to the NSL, its enactment, and implementation. Moreover, these results were consistent with the thesis's proposition that, pro-establishment newspapers framed the HKNSL as 'means to safeguard and guarantee Hong Kongers rights' while pan-democracy and western newspapers framed the law as 'a violation of human rights, namely freedom of press and expression'.

The objective of this study was to examine the diverse framing approaches employed by newspapers in Hong Kong, including a local-Hong Kong newspaper, a mainland China newspaper, and a British newspaper (former colonial ruler), in their coverage of the HKNSL. Given the controversial nature of the law, this dissertation has sought to fully grasp how different the framing processes were. Ultimately, the framing of the NSL between pro-establishment/pro-Beijing papers and pro-democracy is incompatible, almost irreconcilable - for the former the law represents a 'protection of rights' while for the latter the law consists of a 'violation of rights'. Upon the background information and the theoretical framework provided, the analysis, essentially, proves that the construction, thereby framing, of the NSL varies from each newspaper based on their political stance and ideology. Indeed, as a state-sponsored newspaper, *People's Daily's* framing of the law aligns with the government stance on the NSL - that it was enacted to ensure stability against foreign collusion forces, independence forces, rioters and to protect Hong Kongers rights and freedoms -. Accordingly, Hong Kongers' rights are undermined by those forces and not by the law. Moreover, through *People's Daily* the PRC is able to control and monopolize the reader's interpretation of the law, specifically in mainland China where freedom of press is tightly constricted. On the other hand, both *HKFP* and *The Guardian's* framing processes coincide with their political stance towards the law. *HKFP* manifests itself as an independent source that is critical of the law, yet it must watch carefully how to word its articles due to the impact that the NSL has on the media.

Similarly, *The Guardian* is also critical of the NSL and is adamant in defending its former colony, but as an external newspaper, it remains occupied with more issues at hand - something that even becomes the subject of criticism in certain articles.

However, the present study is not exempt from limitations. Most pertinent of all, this thesis has been limited by the lack of second and third coders that could render the study and analysis more accurate and with greater future prospective. Thus, the sample data that was analyzed was more limited in size than what is ordinary of empirical research. Likewise, considering that this dissertation consists of a final degree thesis, there was a restriction in the use of databases that could be used to better collect the data. Additionally, the study's focus on English-language newspapers excluded Mandarin Chinese and Cantonese sources due to language limitations.

Moreover, in spite of attempting to capture the substance of the NSL by exploring on the months prior and after its enactment, the law has continued to be implemented with further implications on the media and press, and by extent on news framing, namely those processes that do not align with the mainstream/government stance. Such a limitation, ought nonetheless to be projected for future research on the subject matter. More extensive research may emerge on the 'frame building' and 'frame setting' of the HKNSL that focuses on more quantitative methods with attention to frequency of frames. Consistently, future research could also consider the impact of the HKNSL on the framing processes utilized by pro-democracy newspapers and how a growing tendency of self-censorship in news media may eventually arise in Hong Kong.

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X. Appendices

Appendix A

Hong Kong Free Press Articles Coding:

| Etiquetas de fila | Suma de Judgmental Headline | Suma de News Perspective | Suma de NSL Support | Suma de Government Actions | Suma de Impact on HKSAR Autonomy | Suma de HHR Violations |
|--|-----------------------------|--------------------------|---------------------|----------------------------|----------------------------------|------------------------|
| * 'A calculated weapon of repression': Democrats, activists, NGOs raise alarm over Hong Kong security law as gov't hails enactment | 0 | 0 | 0 | 0 | 2 | 2 |
| * 'A happy, festive day': Hong Kong marks Handover anniversary under shadow of new security law | 1 | 2 | 2 | 0 | 2 | 2 |
| * 'A Tale of Two Cities': The one Beijing wants and the one Hongkongers are fighting for | 1 | 2 | 2 | 2 | 2 | 0 |
| * 'Comprehensive assault': European Parliament condemns Beijing over Hong Kong national security law | 1 | 0 | 0 | 0 | 2 | 2 |
| * 'GFHG, SDGM': Hong Kong netizens reimagine illegal slogan as protesters find workarounds | 0 | 0 | 0 | 2 | 0 | 2 |
| * 'I will continue until I have no other choice': The art of bookselling under Hong Kong's national security law | 0 | 2 | 2 | 2 | 2 | 2 |
| * 'Police will come for my son': Hong Kong parents seek a way out for their children | 0 | 2 | 2 | 2 | 2 | 2 |
| * 'Worse than the worst-case scenario': Lawyers dismayed at Hong Kong national security law | 2 | 2 | 0 | 0 | 0 | 0 |
| * Artists deny signing petition backing Hong Kong national security law | 0 | 0 | 0 | 0 | 0 | 0 |
| * Beijing has a plan to change Hong Kong – but can citizens fight back? | 1 | 2 | 2 | 2 | 2 | 0 |
| * Beijing unanimously passes national security law for Hong Kong as Chief Exec. Carrie Lam evades questions | 0 | 0 | 0 | 0 | 2 | 2 |
| * China must reconsider Hong Kong security law, 27 countries tell United Nations | 0 | 2 | 2 | 0 | 2 | 2 |
| * China retaliates with sanctions against top US lawmakers and envoy over Xinjiang | 0 | 2 | 0 | 0 | 0 | 0 |
| * EXCLUSIVE: China expert Jerome Cohen – 'We can't give up... when Xi leaves the scene, there will be a return to a better life' | 0 | 2 | 2 | 2 | 2 | 2 |
| * Explainer: 10 things to know about Hong Kong's national security law – new crimes, procedures and agencies | 0 | 0 | 0 | 0 | 0 | 2 |
| * Explainer: From 'five demands' to 'independence' – the evolution of Hong Kong's protest slogans | 0 | 0 | 2 | 2 | 0 | 0 |
| * For a terrifying glimpse into Hong Kong's future, look at how China abuses its own national security law | 2 | 2 | 2 | 2 | 2 | 2 |
| * Hong Kong democrat primaries in full: Young 'localist resistance camp' come out on top | 1 | 0 | 0 | 0 | 0 | 0 |
| * Hong Kong national security law strike plans sputter amid low 'referendum' turnout | 1 | 0 | 0 | 0 | 0 | 0 |
| * Hong Kong national security law: US travel advisory warns of potential surveillance and arbitrary law enforcement | 0 | 0 | 0 | 0 | 0 | 0 |
| * Hong Kong national security law: What's the hurry? The legislature elections are coming | 0 | 2 | 2 | 2 | 2 | 0 |
| * Hong Kong security law revealed – violators may face life imprisonment | 0 | 0 | 0 | 0 | 0 | 0 |
| * Hong Kong security law: New police powers to surveil lawyers a 'major threat', barrister and legal scholars say | 1 | 0 | 2 | 2 | 0 | 2 |
| * Hongkongers waving independence flags or chanting slogans risk arrest under national security law – report | 0 | 0 | 0 | 0 | 0 | 0 |
| * HSBC, StanChart and Jardines publicly back Hong Kong security law plan, after criticism from China's state media | 0 | 2 | 2 | 0 | 2 | 0 |
| * In full: Official English translation of the Hong Kong national security law | 0 | 0 | 0 | 0 | 0 | 0 |
| * In Pictures: Activists around the world stage 'Fridays for Freedom' protests in solidarity with Hong Kong pro-democracy movement | 0 | 2 | 2 | 0 | 0 | 2 |
| * Security law – Facebook, Google and Twitter suspending user info requests from Hong Kong gov't | 0 | 0 | 0 | 0 | 0 | 2 |
| * Security law: US to halt training for Hong Kong police; Fulbright scholarships axed | 0 | 0 | 0 | 0 | 0 | 0 |
| * Slogan 'criminalised' as gov't claims 'Liberate Hong Kong; revolution of our times' is pro-independence, secessionist | 0 | 0 | 0 | 0 | 0 | 2 |
| * Swimming against the tide: The subtle art of resistance in Macau | 1 | 2 | 0 | 2 | 0 | 0 |
| * The July 1st march: Another endangered democratic landmark for Hong Kong | 1 | 2 | 2 | 2 | 2 | 2 |
| * The real struggle begins: As Beijing imposes mainland law on Hong Kong, how will democrats adapt? | 1 | 2 | 2 | 2 | 0 | 2 |
| * Thousands of Hongkongers defy police ban to commemorate Tiananmen Massacre victims at Victoria Park | 1 | 2 | 2 | 0 | 0 | 0 |
| * UK involvement in Hong Kong 'seriously poisoned' relations – China ambassador | 1 | 0 | 0 | 0 | 0 | 0 |
| * Will the UK take responsibility for the defects in Hong Kong's handover deal? | 1 | 2 | 0 | 2 | 0 | 0 |
| * Year of repression: How Hong Kong's leaders twisted the protest narrative to strangle a movement | 2 | 2 | 2 | 2 | 0 | 2 |
| Total general | 19 | 38 | 34 | 30 | 28 | 36 |

Source: author's own elaboration (2023).

Appendix B

People's Daily Articles Coding:

| Articles | Judgment/Headline | New Perspective | NSL Support | Government Actions | HRR Violations | Impact on HKSAR Autonomy |
|---|-------------------|-----------------|-------------|--------------------|----------------|--------------------------|
| Canada's comments on HKSAR national security law interferes in China's internal affairs: Chinese embassy | 0 | 1 | 1 | 0 | 1 | 1 |
| Carrie Lam says national security law conducive to Hong Kong's prosperity, stability | 0 | 1 | 1 | 1 | 1 | 0 |
| Central gov' voices support for implementation of national security law in HKSAR | 0 | 0 | 1 | 0 | 0 | 1 |
| China's national security law for HK bolsters HK stability, prosperity | 0 | 1 | 1 | 0 | 1 | 1 |
| China's national security law for HK to target a few criminals but protect vast majority: ambassador | 0 | 1 | 1 | 0 | 1 | 1 |
| Chinese ambassador rejects fear of broad interpretation of national security law for HK | 0 | 1 | 1 | 0 | 0 | 1 |
| Chinese ambassador shares "1 to 9" facts on national security law for Hong Kong | 0 | 1 | 0 | 0 | 0 | 1 |
| Chinese lawmakers deliberate draft national security law for Hong Kong in group discussions | 0 | 0 | 1 | 0 | 1 | 0 |
| Commentary: Major step in implementing national security law in HKSAR | 0 | 1 | 1 | 2 | 1 | 1 |
| Commissioner's office of Chinese foreign ministry in HK opposes accusations by US diplomat against national security law | 0 | 1 | 0 | 0 | 1 | 1 |
| EU's move over national security law in Hong Kong wrong: HKSAR gov't | 1 | 1 | 0 | 1 | 0 | 1 |
| Highlights of press briefing on national security law for HK | 0 | 1 | 1 | 1 | 1 | 1 |
| HK national security law consistent with China's constitutional scheme, says scholar | 0 | 1 | 1 | 1 | 0 | 1 |
| HK teenager speaks at UN to support national security law | 0 | 1 | 1 | 0 | 0 | 0 |
| HKSAR gov't firmly rejects U.S. counsel-general's remarks on national security law: spokesman | 0 | 1 | 1 | 0 | 1 | 1 |
| HKSAR national security law does not criminalize normal int'l exchanges: official | 0 | 0 | 0 | 0 | 0 | 0 |
| HKSAR national security law to boost "one country, two systems" practice: official | 0 | 1 | 1 | 0 | 0 | 1 |
| HKSAR national security law to put HK back on track: official | 0 | 0 | 1 | 2 | 1 | 0 |
| Hong Kong national security law helps ensure long-term stability of "one country, two systems" | 0 | 1 | 1 | 1 | 1 | 1 |
| Hong Kong police arrest 4 people on suspicion of breach of national security law | 0 | 0 | 0 | 1 | 0 | 0 |
| Implementation rules for Article 43 of national security law in HKSAR gazetted | 0 | 0 | 0 | 0 | 0 | 1 |
| In interview: HK residents' rights, interests guaranteed under national security law: scholar | 0 | 1 | 1 | 0 | 1 | 1 |
| In interview: National security law helps HK recover original aspiration of "one country, two systems": Basic Law drafter | 0 | 1 | 1 | 0 | 0 | 1 |
| In interview: Standards on national security law for HK violate principle of int'l law, says Russian scholar | 2 | 1 | 1 | 0 | 1 | 1 |
| Liaison office of China's central gov't in HKSAR supports national security law in HKSAR | 0 | 1 | 1 | 0 | 1 | 1 |
| Link of exchange rate system unimpaired by the National Security Law: Ex-HKMA head | 0 | 0 | 0 | 0 | 0 | 1 |
| National security law for HK a mirror to West | 0 | 1 | 1 | 1 | 0 | 0 |
| National security law for HKSAR protects human rights: scholar | 0 | 1 | 1 | 0 | 1 | 0 |
| National security law for HKSAR starts new chapter in "one country, two systems": Commissioner's office of Chinese foreign ministry | 0 | 1 | 1 | 0 | 0 | 1 |
| National security law in HKSAR to protect people's rights: HK's legal sector | 0 | 0 | 0 | 0 | 1 | 0 |
| National security law marks turning point for Hong Kong's education: HKSAR chief executive | 0 | 1 | 1 | 0 | 0 | 0 |
| National Security Law paves the way for more prosperous Hong Kong | 0 | 1 | 1 | 0 | 0 | 1 |
| National security law shows central government's commitment to "one country, two systems", high trust in HK: HKSAR chief executive | 0 | 1 | 1 | 0 | 0 | 1 |
| National security law significant for Hong Kong's prosperity: officials | 0 | 1 | 1 | 1 | 1 | 1 |
| National security law won't affect normal operations of Hong Kong's financial markets: official | 0 | 1 | 1 | 1 | 1 | 1 |
| Newspaper of national security law is small advertisement for long-term prosperity, stability of Hong Kong | 0 | 1 | 1 | 1 | 0 | 1 |
| Objection by any country to China's national security law for Hong Kong breaches int'l law - expert | 0 | 1 | 1 | 1 | 0 | 1 |
| Official: National security law for HKSAR a milestone for "One Country, Two Systems" | 1 | 0 | 1 | 0 | 0 | 1 |
| PLA Garrison in Hong Kong says to firmly support implementation of national security law in HKSAR | 0 | 0 | 1 | 0 | 0 | 0 |
| Some say HKSAR national security law exposes double standards: experts | 1 | 1 | 1 | 0 | 1 | 0 |
| Top legislators to vote on national security law for HK | 0 | 1 | 0 | 1 | 0 | 0 |
| Total general | 5 | 31 | 32 | 17 | 20 | 27 |

Source: author's own elaboration (2023).

Appendix C

The Guardian Articles Coding:

| Etiquetas de fila | Suma de Judgmental Headline | Suma de News Perspective | Suma de NSL Support | Suma de Government Actions | Suma de HHRR Violations | Suma de Impact on HKSAR Autonomy |
|---|-----------------------------|--------------------------|---------------------|----------------------------|-------------------------|----------------------------------|
| It is much worse: veterans of Hong Kong's 2003 protests fear new law | 0 | 2 | 2 | 0 | 2 | 0 |
| The 'real' handover: Hong Kong fears looming laws will end 'one country, two systems' | 1 | 2 | 2 | 0 | 1 | 0 |
| Australia will 'continue to welcome' Hong Kong residents as calls mount to match UK's offer of safe haven | 0 | 2 | 0 | 2 | 2 | 2 |
| Boris Johnson lays out visa offer to nearly 3m Hong Kong citizens | 0 | 2 | 2 | 0 | 2 | 0 |
| China accuses Australia of 'gross interference' after offer of safe haven for Hong Kong visa holders | 0 | 0 | 0 | 0 | 0 | 0 |
| China halts Hong Kong extradition treaties with Canada, Australia and UK | 0 | 0 | 0 | 0 | 2 | 0 |
| China is breaking Hong Kong treaty with UK, says Boris Johnson | 0 | 0 | 0 | 2 | 2 | 0 |
| China passes controversial Hong Kong national security law | 0 | 0 | 2 | 2 | 2 | 2 |
| China promises 'firm response' to Trump's order ending Hong Kong's special status | 0 | 0 | 0 | 0 | 2 | 0 |
| China releases details of Hong Kong anti-sedition law | 0 | 2 | 2 | 0 | 1 | 2 |
| China sanctions approved by US House as Pelosi calls Hong Kong security law 'horrific' | 1 | 0 | 0 | 0 | 0 | 0 |
| Chinese ambassador: UK ban on Huawei would damage trust | 0 | 0 | 0 | 0 | 0 | 0 |
| Chinese human rights lawyer jailed for four years, says his wife | 0 | 2 | 2 | 2 | 0 | 0 |
| Controversial Hong Kong national security law comes into effect | 0 | 2 | 2 | 0 | 2 | 2 |
| European leaders condemn China over 'deplorable' Hong Kong security bill | 1 | 0 | 0 | 0 | 0 | 0 |
| Facebook and WhatsApp pause Hong Kong user data requests | 0 | 2 | 0 | 0 | 0 | 2 |
| Hong Kong police given sweeping powers under new security law | 0 | 0 | 0 | 2 | 2 | 0 |
| Hong Kong protesters flee to Taiwan to continue China resistance | 0 | 2 | 0 | 2 | 0 | 0 |
| Hong Kong: China threatens retaliation against UK for offer to Hongkongers | 1 | 0 | 2 | 2 | 2 | 2 |
| Hong Kong: first person charged under new security law | 0 | 0 | 0 | 0 | 0 | 0 |
| Hong Kong: hundreds arrested as security law comes into effect | 0 | 2 | 2 | 2 | 2 | 2 |
| How Hong Kong caught fire: the story of a radical uprising | 2 | 2 | 2 | 2 | 2 | 2 |
| Leading democracy campaigner Nathan Law leaves Hong Kong | 0 | 2 | 2 | 0 | 0 | 0 |
| MPs call for overhaul of China policy after UK suspends Hong Kong extraditions | 0 | 2 | 0 | 2 | 0 | 0 |
| Our spirit will never be crushed: Hong Kong activists vow to keep fighting despite new laws | 1 | 2 | 0 | 0 | 0 | 0 |
| Political purge on Hong Kong opposition may spell end of democracyThis article is more than 2 years oldEmma Graham-Harrison | 2 | 0 | 0 | 0 | 2 | 0 |
| South China Sea: Beijing calls US 'troublemaker' after criticism | 0 | 0 | 0 | 0 | 0 | 0 |
| The Guardian view on rethinking China: right, but not because the US says so | 0 | 2 | 2 | 0 | 2 | 0 |
| The Huawei dispute is only one part of a wider UK-China struggle | 0 | 2 | 0 | 0 | 2 | 0 |
| TikTok fails to shake off authoritarian links to Chinese state | 1 | 2 | 2 | 0 | 0 | 0 |
| UK's expected U-turn on Huawei fails to satisfy Tory rebels | 1 | 2 | 2 | 0 | 0 | 2 |
| US considers travel ban on millions of China Communist party members - report | 0 | 0 | 0 | 0 | 0 | 0 |
| Wednesday briefing: UK lifeline to Hongkongers | 0 | 2 | 0 | 0 | 0 | 0 |
| Total general | 11 | 38 | 28 | 20 | 32 | 18 |

Source: author's own elaboration (2023).