

European Politics and Society: Václav Havel Joint Master Programme

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***“ISIS Brides or Failed Citizens”*: a comparative media
frame analysis of ISIS female members amidst citizenship
deprivation debates in France and the United Kingdom.**

Magister (MA) Thesis

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Abstract

English Version:

This thesis aims to investigate how the citizenship of ISIS female fighters is comparatively conceptualised across the French and British media landscape through the analysis of the ‘Jihadi Bride’ media frame. Overall, it argues France and the United Kingdom are generally both experiencing, despite different rules on the matter, a ‘discursive tightening’ around who is considered a citizen and how citizenship is maintained. Indeed, amidst a regain in national populist sentiment in liberal democracies, centre-right and right-wing political news outlets have endorsed a more individualistic and unidirectional vision of citizenship where the State retains more authority over acquisition and revocation of citizenship. Conversely, left-wing media sources attempt to forge a citizenship model based on a genuine and special link between the State and the individual. Still, gendered, racialised and religiously-discriminatory standpoints limit the scope of application of such a model in reality. Ultimately, this thesis reveals that, behind understanding ISIS female fighters as ‘Jihadi Brides’, the observed media frame transfers directly exclusionary symbolisms onto the concept of citizenship. Undoubtedly, overt or concealed gendered Islamophobia impacts the defined boundaries of citizenship, most notably in the French case. Also, the ubiquitous characterisation of these women as mothers shape and authorise a gendered understanding of citizenship. Interestingly though, while these women’s social reproductive capacities were believed to be put forward, justifications or critiques of citizenship deprivation within the media frame depict their exclusive lack of agency. For their citizenship is envisioned not within their hands, but through their children, as a model of ‘reverse jus sanguinis’.

Keywords: citizenship; citizenship revocation, ISIS female members; ‘Jihadi Bride’; media frame; United Kingdom; France.

Polish Version:

Niniejsza rozprawa ma na celu zbadanie, w jaki sposób obywatelstwo kobiet bojowniczek ISIS jest porównawczo konceptualizowane w krajobrazie medialnym Francji i Wielkiej Brytanii poprzez analizę ram medialnych „Dżihad styczej Panny Młodej”. Ogólnie rzecz biorąc, twierdzi, że Francja i Wielka Brytania doświadczają, pomimo różnych przepisów w tej sprawie, „dyskursywnego zacieśnienia” wokół tego, kto jest uważany za obywatela i w jaki sposób obywatelstwo jest utrzymywane. Rzeczywiście, pośród odzyskania nastrojów narodowych populistycznych w liberalnych demokracjach, centroprawicowe i prawicowe media polityczne poparły bardziej indywidualistyczną i jednokierunkową wizję obywatelstwa, w której państwo zachowuje większą władzę nad nabywaniem i cofaniem obywatelstwa. Z drugiej strony, lewicowe źródła medialne próbują stworzyć model obywatelstwa oparty na prawdziwym i szczególnym powiązaniu między państwem a jednostką. Mimo to, zróżnicowane pod względem płci, rasy i religii stanowiska ograniczają zakres stosowania takiego modelu w rzeczywistości. Ostatecznie, ta teza ujawnia, że za rozumieniem bojowniczek ISIS jako „narzeczonych dżihadu”, obserwowana rama medialna bezpośrednio przenosi wykluczające symbole na koncepcję obywatelstwa. Niewątpliwie, jawna lub ukryta islamofobia płciowa wpływa na zdefiniowane granice obywatelstwa, szczególnie w przypadku Francji. Ponadto, wszechobecna charakterystyka tych kobiet jako matek kształtuje i autoryzuje płciowe rozumienie obywatelstwa. Co ciekawe, podczas gdy uważano, że społeczne zdolności reprodukcyjne tych kobiet zostały przedstawione, uzasadnienia lub krytyka pozbawienia obywatelstwa w ramach medialnych przedstawiają ich wyłączny brak sprawczości. Ponieważ ich obywatelstwo jest wyobrażane nie w ich rękach, ale poprzez ich dzieci, jako model „odwróconego jus sanguinis”.

Słowa kluczowe: obywatelstwo; cofnięcie obywatelstwa, członkinie ISIS; „narzeczona dżihadu”; rama medialna; Zjednoczone Królestwo; Francja.

Acknowledgments:

Motivations for carrying out this thesis is twofold. On the one hand, it hopes to share a light on debates occurring over the matter of citizenship, its acquisition and revocation. Amidst a rise in populist and nationalist ideologies across Europe, politics of ‘othering’ have gained momentum and have systematically targeted minority groups and foreigners. In this context, citizenship has become weaponised at the expense of groups of individuals who integrated on arrival or obtained citizenship legally at birth. For many dual-national citizens or individuals with a mixed background, the current reconstruction of citizenship across liberal democracies puts back into question the veracity of their attachment to their wider national community. Ultimately, this increasing shaping of citizenship as a reproduction of ethno-cultural traditions, thus creating a tier-system citizenship dependent on the State’s own modifiable criteria ought to be spoken about and further researched. On the other hand, after the rise in terrorist attacks on European soil post 9/11, it has become crucial for an upcoming generation witnessing such horrors, to discuss these topics, to build research towards further preventing exclusion, and to further prevent repetition of such events.

I want to first personally congratulate my supervisor throughout this journey Dr Karolina Czerska-Shaw: we did it! I sincerely thank her for her continuous guidance, her steadfast support, as well as for her kindness, energy and wisdom at each step. I also dedicate this work to my Granny and Gramps who have always pushed me to surpass myself and have given me the confidence to pursue my ambitions. I want to thank my parents. I hope to make you proud. Lastly, a special ‘shout-out’ to the city of Krakow, especially its cafés and libraries for the inspiration, the long working hours, and double espressos. Dziękuję bardzo!

Table of Contents

Introduction	6
Literature Review	10
Islamic Terror and Citizenship Deprivation in the United Kingdom and France:	10
a) Islamic Terrorism and the (re)construction of citizenship	10
b) Citizenship Deprivation in the United Kingdom	11
c) Citizenship Deprivation in France	12
A (paradoxical) revival of citizenship deprivation in liberal democracies?:	15
a) The ‘Banishment’ of Banishment	15
b) Grounds for Citizenship Deprivation	16
c) The (In)Compatibility of Denationalisation and Liberal Notions of Citizenship	18
Citizenship deprivation as an instance of ‘lightening’ or ‘thickening’ of citizenship:	19
a) Joppke’s Case for a ‘Light’ Citizenship.....	19
b) Fargues’ Opposition and ‘thickening’ vision of citizenship	20
c) Sykes’ Point on the Securitisation of the Liberal Notion of Citizenship	21
A racialised and gendered categorisation of citizenship?:	22
a) Muslims as Suspected and Marginalised Citizens	22
b) Considering (the lack of) Gender within Citizenship	23
c) The Muslim Woman: at the intersection of Gender and Race	24
‘ISIS Brides’ as gendered racism across media debates:	25
a) Western Muslim Women and The Making of ‘Jihadi Brides’	25
b) The Meaning Attributed to the media frame ‘Jihadi Brides’	26
c) The oxymoron ‘Jihadi Brides’ as Being At Risk and A Risk	26
Theory and Conceptual Framework	29
Conceptualisation of Citizenship:	29
Media Representation and Framing Theory:	32
Methodology	36
Case Analysis:	36
Operationalisation:	37
Case Selection:	39
Analysis	42
The United Kingdom’s ‘safe haven’ model in turmoil:	42
a) Shamima Begum versus the UK Government: a Suspicious and Deceitful Individual.....	42
b) Shamima Begum in the United Kingdom: a Foreigner at Home?	44
c) a Duty to Protect Shamima Begum or Protection of the United Kingdom as a Duty.....	47
France’s eternal quest for ‘republican universalism’ at a crossroad:	50
a) Émilie König versus the French State: a Responsible and Apologetic Individual?	51
b) Émilie König: Redemption through ‘French Couture’ and ‘French kids’?	54
c) Émilie König: ‘groomed daughter of the Republic’ or ‘real enemy of the Republic’	56
Discussion and Conclusion	59
Citizenship as the new battleground for populist nationalists	59
So ‘jihadi bride’ or ‘failed citizen’?: the pervasiveness of Islamophobia	61
Citizenship through ‘reversed jus sanguinis’	62
Bibliography	64

Introduction

On 5 July 2022, over fifty French female jihadists and their children, including UN black-listed jihadi recruiter Emilie König, were repatriated to France from the Syrian Al-Roj camp (AFP & France Info, 2022). On arrival, Emilie König and other women, facing an arrest warrant, were immediately held in custody and handed to the “appropriate judicial authorities”, while their children were handed over to child safety services (MEAE, 2023). After years justifying the adoption of a ‘case by case’ approach, French officials suspended their original procedure and arranged for large-scale returns to take place, following increased pleas from families, as well as facing pressures from non-governmental organisations and international courts (AFP & Le Monde, 2022). Indeed, France was sanctioned later that year by the European Courts of Human Rights for violating the principle that “no one shall be deprived of the right to enter the territory of the State of which he is a national” (ECHR 282, 2022). As France joined the list of European states- including Belgium, Germany or Sweden- which decided to repatriate children and their mothers holding citizenship, the United Kingdom has continuously blocked consular assistance and repatriation arrangements for UK nationals in Syria (Reprieve, 2020). If dozens of children were allowed to enter the UK, the British government’s extensive use of citizenship deprivation (Reprieve, 2020) explains why no adults have been repatriated. On 22 February 2023, ex-ISIS member Shamima Begum lost her appeal against the UK Secretary of State’s decision to strip her of her British citizenship - arguably due to her entitlement to Bangladeshi citizenship through descent according to the UK Foreign Office-. Unable to return to the United Kingdom, she has thus been forced to remain at the Al-Roj camp, the same Emilie König and other French female jihadists could leave.

Shamima Begum’s case has since been extensively covered across British media channels as she epitomised- after she ‘birthed’ the term- the ‘jihadi bride’, especially in the context of her expressed desire to return to the UK after the defeat of ISIS in Baghuz Fawqani in 2019. Indeed, after official contact with her was lost since 2016, *Times* journalist Anthony Loyd found nine-months-pregnant Shamima Begum in a camp on the Syrian border. There, she declared her desire for the British government to come rescue her while unapologetically asserting “that things were not that bad under ISIS rule and that beheadings did not faze her” (Korteweg, Yurdakul, Sunderland & Streppel, 2023, p.998). In reply to her request, amidst intense media debates about

her potential return and her depiction as a security threat, Home Secretary Sajid Javid revoked Shamima Begum's British citizenship making her the first ever British woman in this case (Masters & Regilme, 2020). While it is difficult to measure the extent to which media framing narratives impact policy-making decisions, there is a consensus amongst scholars that the way an issue is presented, constructed and discoursed throughout the media plays a crucial role in shaping public opinion and popular understanding(s) of a topic (Scheufele, 1999; Druckman, 2001; Jackson, 2019). As such, it is worth unpacking the understandings which are conveyed through the metaphor of 'jihadi bride' constructed by British media sources. Far from neutral, the specific representations and narratives which transpire, maintain and reify a gendered and neo-Orientalist view of Muslim women in Western societies as "vulnerable and passive subjects, and as prey of Muslim men and their culture in general" (Martini, 2018, p.471). Further, it insinuates the betrayal of these women as 'sleeping with the enemy- the (foreign) jihadi fighters' and acting against Western generosity which welcomed and integrated them (Martini, 2018; Jackson, 2019). Anna Korteweg, Gökçe Yurdakul, Jillian Sunderland and Marloes Streppel recently researched the contentious role media representations and discourses played in the articulation of justification for and critique of citizenship deprivation. They argued media framing of ISIS females as 'jihadi brides' participated in a "gendered, racialised and class-based conceptualisation of citizenship" (Martini, 2018; Jackson, 2019; Korteweg, Yurdakul, Sunderland & Streppel, 2023, p.997). Exemplified across the reporting done on Shamima Begum, the role of the British media in setting an agenda and framing ISIS female jihadists as worthy, or not, of protection and rescue is of particular interest.

Shamima Begum's media spotlight has rendered an incalculable number of news articles, opinion pieces or documentaries about her fight to return to the United Kingdom (Mohammed, 2020). As much from progressive than conservative politically-leaning news sources, British media systematically referenced Ms Begum in terms of her socio-economic background and (social) reproductive capacities. This particular backdrop structured the debates to justify or critique the stripping of her rights as an 'ordinary' citizen and her effective banishment from the United Kingdom (Mohammed, 2020; Korteweg, Yurdakul, Sunderland & Streppel, 2023). Similar to Begum's case, media sources such as *The Times* or *The Daily Mail* also covered French "jihadi bride" Emilie König's fight to return to her home country (Pleasance, 2021; Sage, 2022). The 28-year-old woman from Brittany had left for Syria in 2012, leaving her two sons with her mother behind. There, she got married to a Belgian ISIS jihadi fighter she had previously met online (Pleasance, 2021). In 2018, Emilie König's mother reported to

French media that her daughter had been captured, interrogated and tortured by Kurdish forces (McGuinness, 2018). In a plea to the French government, she stated Emilie König's desire to return to France in order to "seek forgiveness of her family, her children and her country" (AFP, 2018). Nevertheless, British media articles did not omit to mention König's activities during her time in Syria and titled "French woman accused of recruiting for ISIS" from the Guardian (AFP, 2018) or 'France's most wanted female jihadist' from the Daily Express (McGuinness, 2018). Indeed, Emilie König had appeared on UN and US terrorist blacklists in 2014, notably for her participation in several ISIS propaganda videos aimed to recruit other young girls. Additionally, her calls for an armed jihad or her encouragements to commit terrorist acts on French soil positioned her as a definite threat to national French security (McGuinness, 2018; AFP, 2018). Interestingly, French media also pressed much on Emilie König's status within ISIS, directly referring to her as a 'female jihadist' or simply 'jihadist'. Yet, it rarely directly referred to ISIS female members like Ms König in terms of 'jihadi bride' or its French equivalents 'femmes de combatants' or 'femmes de djihadistes' or 'femmes de DAESH'. Despite the lack of title thereof, it is worth questioning France's media landscape approach towards treating ISIS female members and researching if the discourses and representations bear any similarities with the United Kingdom's systematic application of the 'jihadi bride' media frame. It is interesting to remark a lack of study, at least in Anglo-Saxon scholarship, of the treatment and framing of ISIS female members within the French media landscape. It is even more intriguing because much attention has been given in comparing France's and the United Kingdom's approaches to citizenship deprivation in terms of researching comparisons within both countries respective political discourses and practices or legal codes (Gibney, 2013; Mantu, 2015; Fargues, 2017).

This thesis will thus ask itself two following questions. First, how are ISIS female (potential) returnees' citizenship comparatively framed across the British and French media landscape? Second, reflecting on the results found, what role does gender and race play within these media frames on imagining citizenship?

The aim of this thesis is to offer a comparative analysis of the media frames and subsequent representations and discourses which come at play in the respective media national landscape of the United Kingdom and France in the context of Western ISIS female members attempting to return to their home country. Doing so would help understand whether the frames and discourses applied by both national media landscapes resemble each other or how these

subsequent differences in media framing translate in different conceptions of citizenship-making. It would also allow to offer a starting point in discussing the boundary-making processes around citizenship which operate within the French media over their depiction of ISIS female members. Undoubtedly, it offers an opportunity to, again, unpack and debate over the British media's representation of 'jihadi bride'. Evidently, such a comparison will not allow to confirm or deny the standpoint of whether policy divergences between both countries resulted from the varying application of gendered, racist and class-based discourses on envisioning the boundaries of citizenship. Furthermore, it is not this thesis' intent to affirm or dissent that such media frames fully explain popular stances on the exclusion or return of ISIS female members like Shamima Begum or Emilie König. Rather, comparing both national media landscapes' treatment of ISIS female members through the constructed media frame of 'jihadi brides' seeks to delve into the space such discourses and representations have created. By doing so, it enables to interrogate the meanings which come out from such constructions and on how they affect citizenship-making processes.

In order to answer these problematics, this thesis will first offer an overview of the existing literature covering the topic of citizenship deprivation, the relation of gender and race with citizenship, as well as the standing research on the 'jihadi bride' media frame. Later, this thesis will explain and expose the different conceptualisations of citizenship, as well as offer the application chosen to fit within the constructed theoretical framework. Advancing the vision of 'citizenship' discussed by Paskalev and Bauböck, this thesis will lay the framing theory utilised here and further enumerate the methodological course of action followed.

Literature Review

Islamic Terror and Citizenship Deprivation in the United Kingdom and France:

a) Islamic Terrorism and the (re)construction of citizenship

Western nations' assessments over the conceptualisation and boundary-making process of citizenship dramatically changed post 9/11 attacks (Sykes, 2015). Overall, citizenship and migration scholars concluded that citizenship deprivation had become an increasingly used political and legislative tool, as part of a wider debate in liberal-democratic European societies to interrogate the nexus between national security, citizenship and immigration (Mantu, 2018). Indeed, Western governments witnessed the novel rise of 'home-grown' terrorists, namely European-born or naturalised nationals, perpetrating terrorist attacks on their own soil and against their 'own' national counterparts. The 9/11 attacks were followed by the launch of a US-led coalition against Salafi jihadi terrorist factions which were proliferating across the Middle East and Central Asia and seen as responsible for these events. As Western European nations involved themselves in this novel 'crusade' proclaimed as the 'War on Terror', European cities quickly became targets and fell victims to Islamic terrorist attacks: Madrid in 2004, London in 2005 Paris in 2015 or Brussels in 2016. In all these cases, these coordinated attacks weren't perpetrated by foreign Islamic fighters, but by radicalised European citizens who held Belgian, Spanish, French or British passports.

According to scholars such as Matthew J. Gibney and Patrick Sykes, European political elites were faced with the failures of their previous integration policies concerning different immigrant communities on their territories (Gibney, 2013; Sykes, 2015). At this time, political and public debates discussed these shortcomings and attempted to offer solutions to further ensure national security and fight the perceived erosion of these societies' social contract with regards to the state (Mantu, 2018). As such, public interrogations over promulgating policies and legal provisions restricting access to citizenship, as well as easing the stripping of it, gained wider media attention across European states concerned. France, the Netherlands, Denmark, Belgium or the United Kingdom are examples of states having modified their legislation over citizenship revocation, targeting specifically the denationalisation of terror suspects, in order to respond to rising domestic discontent mobilised by radical and populist right-wing parties (Biard, 2019). As Patrick Sykes argued, European societies now reckoned that "acts considered prejudicial to national security did not simply constitute a 'bad or dissenting citizen', but were

incompatible with the status of citizenship itself’ (Sykes, 2015, p.749). The revocation of citizenship, a process also named as denationalisation, denaturalisation or stripping of citizenship, is not a novel trend and has long been pursued by European states, especially in times of conflict and war (Gibney, 2013; Sykes, 2015).

b) Citizenship Deprivation in the United Kingdom

As Matthew Gibney recalls, the British government had already passed in 1914 the British Nationality and Status of Alien Act which gave powers to the British Home Secretary to initiate the stripping of citizenship of a naturalised subject- muchly linked to target German and Austrian immigrants amidst the First World War- (Gibney, 2013, p.643). Over time, while the authority of the British Home Office to launch a procedure for denationalisation was much restrained and no such use of revocation powers had existed since 1973, citizenship stripping was put back on the political agenda after the turn of the millennium amidst wider discussions around the challenges of multiculturalism, the failure of integration of immigrants and the occurrences of race riots and terrorist attacks (Tyler, 2010; Mantu, 2018). From that point on, British positions have been thus more inclined to embrace harsh(er) rules on citizenship, advancing to make it a ‘privilege’ and not a ‘right’ as part of public debate desiring to reframe the meaning of Britishness (Joppke, 2015; Mantu, 2018).

Looking back, scholars such as Sandra Mantu and Christian Joppke highlighted the importance for the Labour Government at-the-time to act and respond firmly to national security and defence anxieties from the public and strengthen any tools which would underline the reinforcement of sovereignty (Joppke, 2014; Mantu, 2015, 2018). As such, the 2002 Nationality, Immigration and Asylum Act modified citizenship revocation procedures in two significant ways. On the one hand, the legal basis to activate such a procedure now required to show an individual’s actions and conduct to be ‘seriously prejudicial to the vital interests’ of the United Kingdom, rather than proving a ‘breach of allegiance’ (Gibney, 2013; Joppke, 2014; Mantu, 2015). On the other hand, revocation laws, for the first time, applied ‘on an equal basis’ to naturalised and native-born Britons- although only dual-nationals in order to not render a person stateless- (Gibney, 2013, p.653). If the Bill greatly extended the powers of the British Home Office, legal constraints- automatic appeals, confined group of individuals, weighty legal basis- limited the efficacy of the desired instrument (Gibney, 2013). Ultimately, the 2005 London bombings, as Prime Minister Tony Blair declared, changed ‘the rules of the game’ and lowered further the requirements for denationalisation (Jeffery, 2005).

The 2006 Nationality, Immigration and Asylum Act revised the legal basis and allowed for denationalisation if it was ‘conducive to the public good’, a formula already invoked in deportation cases of legal permanent residents in the UK (Gibney, 2013). Later, the 2014 Nationality, Immigration and Asylum Act, concerned about the possible future return of nationals having joined the ranks of ISIS, also lowered the threshold of who is concerned by denationalisation. It allowed for removal of citizenship to be enacted against individuals who did not directly possess another nationality, yet it was believed they were in the capacity to acquire one (Webber, 2022). Notably, this clause permitted the British Home Office to revoke Shamima Begum’s citizenship- as it was argued she is eligible to Bangladeshi citizenship-. Altogether, the United Kingdom has gone the furthest, amongst European liberal democracies, in easing the rules for the stripping citizenship. Indeed, since the first modifications of the law were introduced in 2002, it is believed approximately 220 individuals have been deprived of their citizenship by 2020- the bulk of these revocations happening in 2017 with 107 stripping of citizenship administered- (Webber, 2022).

Overwhelmingly, researchers have observed that cases of citizenship deprivation mostly targeted members of Britain’s Muslim communities, further participating in the making of British Muslims as a ‘suspect community’ whose ‘loyalty and allegiance to British values’ must be verified (Moore, Mason & Lewis, 2008; Webber, 2022). In 2008, Kerry Moore, Paul Mason and Justin Lewis already argued that media debates over Islam depicting the religion as “medieval and dangerous, as well as hostile and threatening” (Said, 1997, p.157; Moore, Mason & Lewis, 2008, p. 6) participated in the policy-making of these denationalisation legislations and furthered discriminatory measures against particular communities. On these grounds, Tufyal Choudhury published in 2017, *The radicalisation of Citizenship Deprivation*, where he argued denationalisation had introduced a hierarchy amongst British citizens, where Muslims were perceived at best as ‘Tolerated Citizens’ or simply as ‘Failed Citizens’ part of the ‘barbaric Other’ (Choudhury, 2017, p.240).

c) Citizenship Deprivation in France

If the legislative changes introduced in the United Kingdom have marked the interest of citizenship scholars, France’s approach towards dealing with revocation of citizenship has also been relatively covered across the scholarship. If France has also recently moved towards enhancing its legislative powers to revoke a French national’s citizenship, its approach has remained relatively cautious and restricted in scope in comparison to the United Kingdom

(Fargues, 2017; Mantu, 2018; Pougnet, 2023). Debates over denationalisation in modern-day France started after the French Revolution in 1789 and the transition from a feudal society to a republican one (Kingston, 2005). France's republican genesis, the French Constitution of 1791, based itself on a notion of modern citizenship as a universal and egalitarian project- not limited to French nationals-. It effectively restricted banishment- revocation of rights and deportation- from the 'imagined political community' to sanction against matters impeding on 'general collective security' (Kingston, 2005). On these foundations, the severity of citizenship revocation, later tied to nationality in the context of further nation-building practices, was significantly limited. If Napoleonic France, the First World War or Vichy France were temporary instances the French State's strengthened its capacity to revoke citizenship, denationalisation had fallen into disuse and only resurfaced much later in political and public debates amidst the rise of Islamic terrorist attacks (Kingston, 2005; Fargues, 2017; Mantu, 2018). Novel mentions of citizenship deprivation in public and political debates were first made after the hijack of Air France flight 8969 in 1994 and the bomb explosion at the Saint-Michel metro station in 1995, both attacks perpetrated by the Algerian Armed Islamic Group (Fargues, 2017; Beauchamps, 2017).

Scholars such as Emile Fargues, Sandra Mantu or Marie Beauchamps have detailed the evolution of France's article 25 of the Civil Code in recent years which legislates on the French State's powers to revoke citizenship of an individual. In 1996, the Marsaud Report recommended the modification of article 25 to include the notion of terrorism in a context where the nexus between counter-terrorism and immigration was increasingly present throughout the political landscape (Beauchamps, 2017; Mantu, 2018). In 1998, article 25 now included the possibility of revoking a naturalised French national's citizenship- citizenship acquired by marriage or naturalisation- if one of the said circumstances was proven: (1) a conviction for acts against the interests of the nation, (2) a conviction for an act constituting one of terrorism, (3) a conviction for an act of insubordination qualified as such by the Civil Code, or (4) or a conviction for engaging oneself for the benefit of a foreign state and committing an act prejudicial to the interests of France and incompatible with the quality of a French national (Légifrance, 2024). In 2006, a revision to article 25 was proposed as part of a counter-terrorism bill, where the time frame in which actions committed by a naturalised citizen could end in with their citizenship revoked was extended from ten to fifteen years (Fargues, 2017; Légifrance, 2024). Interestingly, while much of the literature considering the scope of citizenship deprivation in France occurred post-2015 terrorist attacks, at a time when

the country became an increasing target of Islamic terrorist actions and French nationals were seen leaving their home country to join ISIS in Syria and Iraq, no further legislative modifications of article 25 managed to pass since 2006 (Fargues, 2017; Mantu, 2018).

In the last decade, several attempts have been made from successive French governments to enlarge motivations and scope under which denationalisation could be invoked. In 2010, an initial bid was launched to allow the stripping of citizenship to naturalised citizens having been found guilty of crimes against persons representing public authority (Fargues, 2017). Against the backdrop of general domestic dissatisfaction with the French government at-the-time, the bill was rejected. The next proposed reform happened in 2015. Post-terrorist attacks in Paris, President François Hollande proposed a constitutional amendment to enlarge citizenship deprivation boundaries to all binational citizens, even born with French citizenship- resembling at this point the British model-. However, after intense political and media debates, which led to the resignation of the then Justice Minister Christiane Taubira, the proposed reform never saw the light of day (Vaudano, 2016). Amongst many reasons for the Bill not passing was that such reform would create a hierarchy between French native-born individuals, between dual national and fully national. Added on top of the existing hierarchy between born nationals who possess an irrevocable right to nationality while naturalised have a conditional form of identification to the national community was deemed too much (Beauchamps, 2017). For many, this proposal went contrary to France's universalist and republican tradition, putting equality at the fore (Mantu, 2018). Ultimately, it was deemed unacceptable for this new step to redraw the boundaries of citizenship around the creation of a sub-citizens class, since binationality involved the creation of an intermediary zone between citizens and foreigners with regards to protections against deprivation of citizenship (Mantu, 2015).

Lastly, in 2023, this debate within French politics came to the fore once more amidst the vote of a new Immigration and Asylum bill. Modifications of citizenship stripping were proposed in the new legislative piece, extending deprivation of citizenship to binational citizens and allowing for its use amidst "the perpetration of a culpable homicide against an individual in a position of public authority" (Légifrance, 2023). While successfully passed through legislative bodies, the Conseil Constitutionnel- France's highest constitutional authority- deemed the amendments inadmissible and unconstitutional- as it created a hierarchy of rights between fully-French and binational citizens- (Décision n°2023-863 Conseil Constitutionnel, 2024).

A (paradoxical) revival of citizenship deprivation in liberal democracies?:

a) The 'Banishment' of Banishment

Recently, migration and citizenship scholars have acknowledged the lack of research carried out on the topic of loss of citizenship, despite a rather large academia, gathering legal theorists, political scientists or philosophers, focused on citizenship acquisition and the conceptualisation of the notion of post-nationalism (Gibney, 2013; Mantu, 2015). The absence of study on citizenship deprivation can be attributed to the liberal turn which marked the politics of citizenship in Western European states after the Second World War. Indeed, under the new tenants of international law, a commitment in reducing possibilities of statelessness was achieved within international organisations, which in parallel limited and restricted the stripping of an individual of its citizenship. In the Universal Declaration of Human Rights of 1948, Article 15 declared that “everyone has the right to a nationality...(and that) no one shall be arbitrarily deprived of his nationality” (Zedner, 2016, p.232). Further, the 1954 and 1961 Conventions on Statelessness contributed to prohibit denationalisation powers for states if it would render a person stateless (Zedner, 2016). These developments occurred as the notion of citizenship was requalified as a human right, in Hannah Arendt’s words, ‘the right to have rights’ (Arendt, 1951, p.256). In her book, *The Origins of Totalitarianism*, Arendt’s ninth chapter argued in favour of her formulation of citizenship drawing upon the use of denationalisation powers by Nazi Germany during the Second World War. At that time, described as ‘scum of the earth’ subjects which lacked the protection of a state, stateless Jews and other minorities had become the targets of the Nazis’ campaigns of racial exclusion and extermination (Arendt, 1951). It is also worth mentioning the spiteful use of citizenship revocation by liberal democracies pre-1945, where countries actively put in place discriminatory laws rendering some citizens more vulnerable to denationalisation on grounds of race, ethnicity, gender or national origin (Gibney, 2019).

Additionally, legal discriminations were complimented by discriminatory enforcements of these laws ”reflecting informal social and political understandings of the subordinate standing of some ethnic and racial groups” (Gibney, 2019, p.2552). Ultimately, statelessness and banishment- understood as made possible by the revocation of one’s rights to citizenship- was perceived to have only contributed to persecution and death (Arendt, 1951; Gibney, 2013). From a liberal standpoint, citizenship stripping was perceived as a radical punishment formulated by the state, comparable to the death penalty, as it involved the ‘civic

death' of an individual (Gibney, 2019, p. 2552). In other words, rather than physically removing an individual by death, citizenship revocation was much more pernicious because it removed any duties of the state towards one of its members, such as duties of care or protection (Gibney, 2019). In this liberal perspective, the US Supreme Court came to view denationalisation, after *Trop v Dulles* in 1958, as 'the total destruction of the individual's status in organised society. It is a form of punishment more primitive than torture' (Webber, 2022, p.6). On these foundations, liberal perspectives of citizenship had constructed it to be a human right, considered as unconditional and inalienable (Gibney, 2013; Macklin, 2014; Mantu, 2015; Joppke, 2014). Ultimately, as Matthew Gibney puts it, "the constraint against statelessness is not simply a matter of international or domestic law; it is also a normative constraint that stems from basic liberal commitments" (Gibney, 2014; Zedner, 2016, p. 232).

b) Grounds for Citizenship Deprivation

As Sandra Mantu or Matthew Gibney put it, restrictions on the applicability of citizenship deprivation in liberal democracies, coupled with a prime focus on observing the restrictive changes introduced on nationality attribution laws and procedures after 2000, delayed citizenship scholars' attention to the (re)emergence of citizenship stripping as a counter-terrorism policy tool (Gibney, 2013; Mantu, 2015). Indeed, migration and citizenship studies long unpacked and critiqued reversals on citizenship acquisition requirements and affirmations over the failure of multiculturalism. It is only after the intensification of terrorist attacks committed by European nationals, the increase in observed departures to join the newly-formed Islamic State and the proliferation of public interrogations about future returns of ISIS members that migration and citizenship scholars focused on the ethics, causes and consequences of the resurgence of denationalisation policies (Joppke, 2014; Sykes, 2015; Mantu, 2015). An initial contribution on the conceptualisation of citizenship revocation, later employed by various academics, was made by Alexander Aleinikoff in his 1986 paper on *Theories of Loss of Citizenship* (Aleinikoff, 1986). At that time, denationalisation was framed as a response to "a person's breach or denial of allegiance" which allowed for the state to act upon the "severing of the link between citizen and nation" (Aleinikoff, 1986, p.1473). On top of that, it is understood that the lack of allegiance thereof, or the alleged transfer of allegiance to another party, or otherwise the division of an individual's allegiance into two parties does not suffice to cover all reasons for denationalisation. Indeed, Aleinikoff contends citizenship revocation is also grounded in the act of punishment, in other words, that it is the state's intent to remove the benefits granted to a national as a reprisal against "people it- the state- believes

are unworthy of enjoying them” (Aleinikoff, 1986, p.1474). Lastly, it is argued citizenship revocation can result from the state’s judgement that an individual represents a threat to public order and that “membership in the nation poses a substantial problem for the maintenance of the status quo or the pursuit of other national objectives” (Aleinikoff, 1986, p.1474-75). On these foundations, scholars later framed denationalisation around these three umbrella categories, not mutually exclusive from one another, and which could help explain constituting grounds for stripping citizenship. While Matthew Gibney, for instance, highlighted citizenship stripping as a form of punishment for specific behaviours or a response to protect the vital interests of a state (Gibney, 2019), Shai Lavi exclusively argued that imposed regulations on loss of citizenship could only be justified as a punishment insofar that “revocation is not justified as means to a social end, such as national security or solidarity, but is rather the deserved outcome of the criminal’s own doing” (Lavi, 2011, p.786). Similarly, Christian Joppke agreed with Lavi detailing that “only an explicitly punitive rationale of citizenship is commensurate with the constitutional importance of citizenship” (Joppke, 2015, p.733).

Sandra Mantu defined denationalisation as “the power of the executive to take away or strip citizenship against the wishes of the person concerned” (Mantu, 2015, p.3). Matthew Gibney confirmed this hypothesis that “denationalisation involved non-consensual nationality loss” (Gibney, 2019). Close to Gibney’s standpoint, Mantu deemed the action of revocation as a punishment for unacceptable behaviours in the eyes of the state as such, or for the sake of public order after the involvement of an individual in criminal or terrorist activities against the interests of the state (Mantu, 2015). Nonetheless, Mantu opened the definition up and added that fraudulent acquisition of citizenship, namely perjury and/or disloyalty, could also result in the state revoking one individual’s citizenship (Mantu, 2015). Similarly, the European Union Democracy Observatory on Citizenship gathered similar reasons which justified denationalisation across the European Union (Bauböck & Paskalev, 2015). Through an inductive typology of fifteen different grounds for denationalisation across EU Member States’ legislation, five categories emerge out of these criteria. If the importance of public security and order is crucial, noticeable attachments to the principle of punishment are recorded through the categories of ‘non-compliance with citizenship duties’ or ‘flawed acquisition’ and to the principle of allegiance through the categories of ‘derivative loss as consequence of loss incurred by an anchor person’ or ‘loss of genuine link’ (Bauböck & Paskalev, 2015, p.5). Ultimately, Mantu justified studying the revocation of citizenship as enabling to discover the borders of nationality, across its attribution or removal, participating then in creating “a

symbolic field of state power that dictates the composition of the citizenry, therefore affecting underlying ideals of identity and membership” (Mantu, 2015, p.3).

c) The (In)Compatibility of Denationalisation and Liberal Notions of Citizenship

Since the dawn of the ‘War on Terror’ against radical Islamic organisations, political and public debates within European liberal democracies have turned away from deliberations on whether to facilitate the granting of citizenship, and have rather introduced policies to ease its removal without consent (Gibney, 2013; Joppke, 2015; Mantu, 2015). As detailed by Rainer Bauböck and Vesco Paskalev, the expectation that liberal democracies would respect international law and the liberal-espoused formulation of citizenship as the ‘right to have rights’ was challenged in the context of rising linkages between citizenship, public security and migration (Bauböck & Paskalev, 2015). Indeed, there has been a rising opposition interrogating “the legitimacy and compatibility of citizenship deprivation with the principles that underpin liberal democracies” (Mantu, 2018, p.28). An instance of contestation has been over the treatment of binational citizens who are deemed, in some cases, as not fully-fledged members of a political community and are thus more at risk of citizenship deprivation than other nationals holding one citizenship (Gibney, 2013). Similarly, citizens having acquired nationality through marriage or naturalisation are also more exposed, under current rules in particular democracies, if engaging in actions falling under the jurisdiction of denationalisation (Gibney, 2013). As such, the embedded creation of a hierarchy amongst citizens’ membership to a political community amidst hardened citizenship deprivation laws clearly oppose the central tenet of liberal citizenship of equality of nationals before the law (Gibney, 2013; Mantu, 2015). Furthermore, it is worth mentioning that, amidst the multiplication of dual-national citizens across the world, scholars have underlined how the effect of such laws concern larger groups of individuals and further problematise the continuation of the mixture of citizens (Bauböck & Paskalev, 2015; Mantu, 2015). On these grounds, it has been interpreted that the enactment of extended citizenship deprivation powers within European liberal democracies, in response to the perceived failures to integrate migrants present on their soil, has highlighted the ‘downside’ of liberal citizenship conceptions in the European context (Mantu, 2018, p.28).

Citizenship deprivation as an instance of ‘lightening’ or ‘thickening’ of citizenship:

a) Joppke’s Case for a ‘Light’ Citizenship

Scholars’ critical stances over the current legitimacy to frame citizenship in Europe through the lens of liberalism stems from the contradictions and incoherencies presented so far. Moreover, these dissenting opinions also play out across debates with academics who sustain claims that European democracies still apply liberal notions of citizenship. Indeed, migration and citizenship academic, Christian Joppke, has acknowledged rising conflicting elements amidst the application of denationalisation and unclear causal explanations to justify such developments (Joppke, 2010; 2019). Yet, Joppke has continuously rejected opinions on the disappearance or fading of the liberalisation process of citizenship (Joppke, 2010; 2019). First, despite divergent citizenship and nationhood traditions throughout liberal democracies, Joppke declared that attempts by European states to launch “contemporary campaigns for upgrading citizenship (...) are desperate, yet ultimately futile, rear-guard actions against the inevitable lightening of citizenship in the West” (Joppke, 2010, p.12). The aforementioned frame of ‘lightening of citizenship’ was defined by Joppke to depict the fading importance attached to citizenship. According to the German political sociologist, the liberalised trend of citizenship is identified in its ease of access, its thin and procedural identity meaning a lack of stark differentiation between a nation-state society and other societies, as well as its offer of rights which are not far from matching non-citizens’ ones (Joppke, 2010, p.12).

In practice, this has translated into European states having opened access to citizenship through *jus soli* (place) and *jus sanguinis* (descent) rules of acquisition, having lowered naturalisation requirements and procedural counts, along with having become more tolerant of dual nationality (Joppke, 2010). Furthermore, Joppke explains that recent efforts of governments in promoting further civic integration through tightened requirements around citizenship acquisition and cultural assimilation only involves demands for citizens to “endorse broad principles of human rights, tolerance and democracy” (Smith, 2010, p.548). Ultimately, Joppke’s conceptualisation of a ‘light’ citizenship also made sense of a growing ‘return of banishment’ in the context of enhanced denationalisation powers (Joppke, 2015). In his 2015 paper *Terror and the Loss of Citizenship*, Joppke joined into academic debates and sustained his ‘lightening’ formula since he declared that “to the degree that contemporary liberal state citizenship is undergoing a process of ‘lightening’, the logic corollary to this (...) is the enhanced possibility of losing it” (Joppke, 2015, p.729). In other words, believing that Matthew

Gibney's or Audrey Macklin's vision of citizenship as an unconditional and unalienable right is anachronistic, Joppke claims that the easing of denationalisation powers is the natural expression of the easing to acquire citizenship (Joppke, 2015, p.735-36). Considering that citizenship is increasingly understood as a 'privilege' and a 'contract' and citizenship stripping applies within the grounds of being a punishment, Joppke contends that "citizenship is not 'owned' by the individual" (Joppke, 2015, p.742). As such, citizenship is not a 'right' but a privilege reliant on a state's sovereign power, and subsequently on the 'contract' it beholds with an individual. In that case, Joppke argues that "a breach of contract must logically imply the possibility of losing citizenship" (Joppke, 2015, p.743), and it is deemed state authorities should possess an unrestricted authority of invoking such powers.

b) Fargues' Opposition and 'thickening' vision of citizenship

In response to Christian Joppke's positions, several academics have contradicted his stances and voiced their own interpretations over the evolving nature of denationalisation policies within liberal democratic states. Indeed, Emile Fargues opposed the espoused post-national citizenship discourse Joppke painted of an inevitable 'lightening of citizenship' within liberal democracies (Fargues, 2017). According to Fargues, citizenship revocation has been part of a wider campaign of 're-nationalisation' which describes "states' manoeuvres that reaffirm their sovereign capacity to control borders" (Sassen, 2006, p.414) and who "seek to strengthen the control of sovereign states over individuals rights (migrants' rights in particular)" (Fargues, 2017, p.985). In that sense, 're-nationalisation' efforts go directly against the view of a 'lightening of citizenship' and actually depict 'a thicker character' being given to citizenship (Fargues, 2017, p.985). In relation to Joppke's viewpoint on the undergoing liberalising trend of citizenship aforementioned, Fargues highlighted appearing flaws. First, the easing of access to citizenship has been constrained as new barriers appeared such as (harder) language and citizenship tests. Furthermore, the equivalence of rights for citizens and non-citizens has subsequently slid backwards and inequalities in opportunities and rights have widened. Lastly, citizenship acquisition and conservation has now been made dependent 'on the assimilation of a culture, thereby giving the national community a 'thicker' definition through these policies" (Fargues, 2017, p.986). As France and the United Kingdom as case studies to complement his 'thickening' formulation, citizenship deprivation, despite both countries divergent approach and legal frameworks, has been observed as an instance which upholds the 'conditionality' and 'consequentiality' of citizenship (Fargues, 2017). In other words, the legislation adopted in liberal democracies has allowed for the requalification of

citizenship as a 'privilege' and 'contract'. Still, Fargues adds that "on a more symbolic level, it presents the national community as a homogenous entity whose social cohesion needs to be protected from dangerous foreigners" (Fargues, 2017, p.985). As such, liberal democracies have increased their powers to "differentiate along ethnic lines between different categories of citizens who do not enjoy the same level of protection against deprivation orders, thereby re-'ethnicising' national membership" (Fargues, 2017, p.987). Vesco Paskalev or Peter Schuck shared this observation, as they argued the application of harsher citizenship revocation powers towards 'bad citizens' was not effectively realised to punish terrorists for their actions. In the end, its aim was to protect and reassure the meanings attached to the status of citizenship for certain groups while leaving other clusters of citizens in a state of precariousness and of 'having to act on their best behaviour' (Schuck, 2014; Paskalev, 2014).

c) Sykes' Point on the Securitisation of the Liberal Notion of Citizenship

Similar to Fargues, Patrick Sykes agreed that the notion and meanings attached to citizenship have evidently distanced themselves from the initial liberal conceptualisation of citizenship amidst a resurgence of denationalisation within liberal democracies at the turn of the twenty-first century (Sykes, 2015). While opposed to Joppke's view on a 'lightening' of citizenship, Sykes contended that a perceived securitisation of the concept of citizenship did not automatically translate into a full disappearance of the liberalising trend of citizenship (Sykes, 2015). Indeed, drawing upon Aleinikoff's opinion that denationalisation policies are implemented on grounds of public order preservation, it is argued a 'civic republican discourse' appeared to coalesce with liberal notions of citizenship, putting an emphasis on the importance of public security and 'good' behaviour of citizens. This novel discourse is understood to be "not an alternative to one that espouses a more limited political arena, but precisely as a tool designed to effect the limitation of that arena" (Sykes, 2015, p.759). Here, liberal notions of citizenship seemed to modify themselves to include a space for assessment of an individual's compatibility with the meanings attached to citizenship. In other words, a surge in rhetoric portraying citizenship as based on loyalty to the state merged with views of citizenship as the basis for an individual's rights. Citizenship thus remained "conceived as a body of individuals rights, but conditional on loyalty to the state" (Sykes, 2015, p.759), allowing for an easier removal of selected 'disloyal' and thus 'undesirable' individuals or groups from the political community. Ultimately, on a similar line than Emile Fargues, academics like Sykes have underlined how new visions of liberal democracies' citizenship models espousing strong denationalisation powers have effectively produced a categorisation of citizens and an unequal

treatment in the protection the state should enforced vis-à-vis the state-citizen relationship it maintains (Sykes, 2015; Zedner, 2016; Fargues, 2017). It is through the creation of precariousness of some citizens' statuses that the possibility of denationalisation, implicitly meaning removal and banishment, has become an achievable measure (Gibney, 2013; Sykes, 2015; Mantu, 2015). Audrey Macklin, a staunch opposer to the practice of citizenship stripping, characterised it as a "superfluous and anachronistic" practice (Macklin, 2014). She detailed the discriminatory nature of such a power like Milena Tripkovic. Both showcased as two classes of citizens were produced: "those who citizenship may or may not in principle be revoked" (Tripkovic, 2021, p.1045).

A racialised and gendered categorisation of citizenship?:

a) Muslims as Suspected and Marginalised Citizens

In Matthew Gibney's *Denationalisation and Discrimination* paper, he first acknowledges discriminatory influences were drastically limited in the construction of citizenship regulations post-1945. Still, alongside Milena Tripkovic and Tufyal Choudhury, Gibney contends denationalisation remains enforced, legally and practically, as an instance of discrimination between citizens along racial, ethnic, national and gender lines (Choudhury, 2017; Gibney, 2019; Tripkovic, 2021). Schematically, it is imagined that to justify of a citizen's deprivation requires the concerned citizen to be categorised as belonging to one of the aforementioned groups. In other words, justifications over an individual's citizenship deprivation order are intertwined to the individual-in-question's race, ethnicity, gender or nationality (Gibney, 2019). According to a *New Statesman's* article, proposed amendments to British legislation on denationalisation in 2022 placed 41% of 'non-white ethnic minorities' at risk of citizenship deprivation while only 5% of white citizens were concerned (Van der Merwe, 2021). From this practical assessment, an increasing number of critical race and feminist scholars have picked up and legitimised the claim that "apparently 'neutral' laws became tools of radicalisation (...) creating a two-tiered citizenship" (Korteweg, Yurdakul, Sunderland & Streppel, 2023, p. 1001).

Amidst the proliferation of Islamic terrorism post 9/11 and the rise of ISIS, a particular attention has been given to the nexus between citizenship, terrorism, race and gender. Specifically, Tufyal Choudhury has argues the growing securitisation of citizenship policies

has overwhelmingly been targeted against naturalised and dual-national citizens from Muslim-descent (Choudhury, 2017; Webber, 2022). Indeed, it is believed liberal democracies reinforced the crucialness of identifying and ascribing to national values put at the centre of the normative space created to conceptualise citizenship. The pursuit of such a strengthened ethno-cultural bloc by authorities has thus resulted in a ‘hardening’ of what citizenship entails and offers to some citizens. Notably, doing so enabled to marginalise communities which do not identify directly with normative assumptions presented. Choudhury argues Muslim communities face such a situation which constructed further narratives of necessary surveillance and categorisation. For European states, exemplified in the British case, Choudhury demonstrates how Muslims are sorted as ‘Good’, ‘Tolerated’ or ‘Failed’ citizen (Choudhury, 2017, p.229). Indeed, introduced by British Professor of Migration and Citizenship Bridget Anderson, the importance attached to a known identity and ‘Western’ values helped manage the surveillance of Muslim citizens between the ones adhering to the defined values (good citizens), the ones opposed to such values (failed citizens), and lastly, the ones “contingently accepted but needing to constantly prove their belonging to the community of value through speaking out and condemning terrorism” (tolerated citizens) (Choudhury, 2017, p.229). In essence, scholars contended that “the equal citizenship of Muslims is, in practice, precariously dependent on their being able to prove their allegiances to ill-defined Western values” (Webber, 2022, p.77).

b) Considering (the lack of) Gender within Citizenship

From a critical perspective, it is undeniable that citizenship revocation is a practice which works along racialised assumptions about individuals (Korteweg, Yurdakul, Sunderland & Streppel, 2023). Nevertheless, it has been highlighted that little attention has been given to analyse the implications of citizenship stripping through a gendered lens (Korteweg, Yurdakul, Sunderland & Streppel, 2023). In all, the scholarship surrounding terrorism studies has been heavily dominated by research from a male-centred approach. Feminist scholars have been attempting to put women at the fore of terrorism research in recent decades (Sjoberg & Gentry, 2007; Jacques & Taylor, 2009), focusing greatly on unpacking female terrorists’ trajectories towards radicalisation (Pearson, 2016; Pearson & Winterbotham, 2017; Biswas & Delaymi, 2019; Mohammed, 2020). Over time, a growing academic opinion rose and critiqued the failure and neglect of mainstream security studies to consider the concept of gender (Pearson, 2016, Martini, 2018, Sjoberg, 2018; Jackson, 2019). The effect of such exclusion largely resulted in gendered assumptions and stereotypes permeating existing literature, depicting women as

‘monsters’ or ‘victims’ who lack conformity with gendered attributes of peace and passivity (Pearson, 2016; Sjoberg, 2018; Jackson, 2019). As such, a branch of feminist scholars contributed to outlining “gendered assumptions, emphasising personal explanations for involvement, including family, romance and sexual assault, while downplaying political and ideological motivations” present across discourses (Jackson, 2019, p.1735). In parallel, hegemonic gender perspectives allowed for the proliferation of such discourses and representations across the political sphere or media landscape where usual actions “work within other socio-cultural hierarchies to construct legitimate and illegitimate subjectivities” based on gender (Jackson, 2024, p.3).

c) The Muslim Woman: at the intersection of Gender and Race

The literature has identified there is a lack of consideration of the impact of gendered, racialised and class-based understandings of citizenship within the process of denationalisation (Martini, 2018; Jackson, 2019; Korteweg, Yurdakul, Sunderland & Streppel, 2023). Alice Martini and Leonie Jackson, two academics tackling the place of women in terrorism, have emphasised the importance of intersectionality when it comes to looking at perceptions of women in conflict. Specifically, both observed how Muslim women, in the context of departing ISIS female members, were constructed discursively and imaginatively at the intersection of gender and race. Martini explained how gendered constructions which produces “a regime of truth on biological differences” crossed neo-Orientalist understandings where ‘Western values’ are assumed as universal, desirable and desired in comparison to fabricated ‘Oriental values’ tied to Islam, viewed as barbaric (Martini, 2018, p.459). From that point on, knowledge about Muslim women becomes tainted by a vision of themselves as victims of their own culture and the ‘barbaric’ Muslim man as gendered agents considered as ‘peaceful, domestic and caring’ individuals fulfilling roles of daughters, wives or mothers (Martini, 2018, p.459). Jackson continued on and detailed the construction of Muslim women through the prism of ‘hegemonic and pariah femininities’ where the forms of femininity encouraged and accepted in society are governed and regulated (Jackson, 2024, p.4). Here, Muslim women are awaited to espouse ‘Western’ models of femininity which downplay and attempt to fade the political and ideological characters these women may possess (Jackson, 2019; 2024).

‘ISIS Brides’ as gendered racism across media debates:

a) Western Muslim Women and The Making of ‘Jihadi Brides’

According to a 2018 report from the International Centre for the Study of Radicalisation at King’s College London, the absence of government data has made it difficult to quantify the exact number of Western women and girls who left to join the Islamic State Caliphate (Cook & Vale, 2018). It is estimated that between April 2013 and April 2018, 145 British women and 50 minors travelled to join the territories held by ISIS in Syria and Iraq (Cook & Vale, 2018). That number has been greatly critiqued by counter-terrorism experts who argued the figure to be vastly underestimated (Khomani, 2018). In the case of France, it was estimated as many as 382 women and 700 minors joined the ranks of ISIS (Cook & Vale, 2018). A common characteristic which emerged from the profiles of these departures were the women’s young age, with many cases of teenagers as young as 15 years old (Cook & Vale, 2018). While most of these women were second-generation immigrants, an increasing number of Western converts figured on the Islamic State’s theatres of conflict (Eggert, 2015). Their motivations for leaving their home countries were manifold. Scholars, such as Anita Perešin, Karen Jacques or Paul J. Taylor, all advanced that the motivations for these female foreign fighters tended to be ideological, personal and religious ones rather than pursuant to financial gain or the pursuit of fame (Perešin, 2015; Jacques & Taylor, 2009). Erin Marie Saltman and Melanie Smith detailed a wide range of push factors- perception of isolation of Muslims in Europe for instance- or pull factors- a novel sense of belonging or the romanticisation of life under ISIS through propaganda for example- which arguably testify of the complexity of explaining such a choice (Saltman & Smith, 2015; Eggert, 2015). Nevertheless, the data produced by a 2017 report from the European Parliament’s Committee on Women’s Rights and Gender Equality, confirmed by the International Centre for the Study of Radicalisation the following year, noted a sharp rise in cases of European-born women leaving for Syria and Iraq occurred post-2015 after a call of Abu-Bakr Al-Baghdadi, leader of the Islamic State, for women to come ‘build’ the new Caliphate (EU FEMM, 2017; Cook & Vale, 2018). Explicitly, this ‘building’ metaphor related to the (social) reproductive capacities of women which were understood to be a necessity for the survival and maintenance of the newly-possessed Islamic State territories. From that viewpoint and to make sense of these European women leaving to join ISIS, Anglo-Saxon media channels coined the label ‘jihadi bride’ to refer to female ISIS members who were believed to leave their families and home countries in order to find husbands and become wives, later on mothers (Martini, 2018). This term appeared first and entered public consciousness in the United Kingdom after three London schoolgirls embarked on a flight to

Turkey in 2015 to later reach IS-held territories in Syria on grounds to allegedly marry ISIS fighters (Dodd & Khomani, 2015). One of these schoolgirls was aforementioned 15-year-old Shamima Begum.

b) The Meaning Attributed to the media frame ‘Jihadi Brides’

On these foundations, scholars have begun interrogating themselves on the representations and perceptions attributed to Muslim women who have joined ISIS from Europe. In this context, much focus has been attributed towards unpacking and analysing contributions on the subject in policy and media spheres. Specifically, a body of the literature on women in terrorism has observed the rise of the gendered racism epithet ‘jihadi bride’. At first, the description of ‘jihadi bride’ subscribed to the ‘Western’ visions of Muslim women as ‘weak, powerless, and vulnerable’ (Jackson, 2019; Mohammed, 2020). The constructed metaphor rendered these women as passive, misled and brainwashed. It seemed to imply they were incapable of their own discernment and decision-making as seemingly believed to fall under their ‘jihadi’ husbands’ responsibility and control (Martini, 2018; Jackson, 2019; Mohammed, 2020). All these gendered and racist assumptions allowed to put an emphasis on “personal explanations for involvement, including family, romance and sexual assault” (Jackson, 2019, p.1736). Ultimately, ‘jihadi bride’, in a symbolic world, positioned these women as victims, distancing them from their (possible) reality of making a rational choice to join ISIS (Martini, 2018; Jackson, 2019; Mohammed, 2020). Martini, who clearly denounced this ‘infantilisation’ of Muslim women, also stated the crucial role of the media in “the reproduction, creation and reinforcement of discourses (...) that set particular events within their broader context” (Martini, 2018, p.462). In other words, the metaphor ‘jihadi bride’ allowed to make sense of an ‘inexplicable’ issue. It simplified for audiences the decisions of departure of these women and rendered ‘jihadi brides’ to their gendered and racialised roles (Martini, 2018; Jackson, 2019).

c) The oxymoron ‘Jihadi Brides’ as Being At Risk and A Risk

Nonetheless, in 2018, Laura Sjoberg’s piece *Jihadi Brides and Females Volunteers: Reading ISIS’ war to see Gender and Agency in Conflict Dynamics* argued that women terrorists were “either totally ignored or sensationalised” within media, academic or political debates (Sjoberg, 2018, p.298). Amidst the fall of ISIS and the possible return of these women holding citizenship, media and political discursive representations through the metaphor ‘jihadi bride’ widened to allow for justifications and critiques of citizenship deprivation (Korteweg,

Yurdakul, Sunderland & Streppel, 2023). For instance, based on research carried out by Laura Sjoberg and Caron Gentry, women involved in terrorism have commonly been categorised as “mothers, monsters and whores” (Sjoberg & Gentry, 2007). These narratives surrounding ‘motherhood’ draw women as protective and vengeful because of their maternal instincts; then, the ones perceiving women as ‘monsters’ emphasised how they become ‘psychologically disturbed’; lastly, the ones of women as ‘whores’ suggests women’s dysfunctional sexual fantasies are paired to their potential violence (Sjoberg, 2018, p.298). These frames sustain that ISIS female members are understood as manipulated and allows for the production of gendered “well-rehearsed plotlines such as ‘the good girl gone bad’ or ‘for the sake of love’” (Jackson, 2019, p.1734).

However, scholars also have underlined the importance of the metaphor ‘jihadi bride’ within the decision to repatriate these women after the fall of ISIS or actually exclude them from society, namely stripping them of their nationality and banishing them (Korteweg, Yurdakul, Sunderland & Streppel, 2023). Indeed, by focusing on the social reproductive capacity of these women as wives and mothers, that is on their “creation and recreation of people as cultural and social as well as physical human beings who engage in an array of activities and relationships involved in maintaining people both on a daily basis and intergenerationally” (Korteweg, Yurdakul, Sunderland & Streppel, 2023, p.1003). Here, the symbolic dimension of social reproduction, directly tied to nationhood and citizenship, is also racialised which positions these women as part of the ‘other’ or the ‘threat’ identified as the Muslim man. As such, the media’s extensive and continuous use of the metaphor ‘jihadi bride’, especially across Anglo-Saxon news outlets, seems to broaden a racialised and gendered conceptualisation of citizenship (Martini, 2018; Sjoberg, 2018; Jackson, 2019; Korteweg, Yurdakul, Sunderland & Streppel, 2023). On that matter, Anna Korteweg, Gökçe Yurdakul, Jillian Sunderland and Marloes Streppel gathered to observe the ‘jihadi bride’ narrative abroad, in the Netherlands, in comparison to the United Kingdom in order to better assess the discourses and representations which appear out of this constructed frame.

Ultimately, the literature covered has allowed to set the scene and highlight an existent gap in the research when it comes to observing the consequences of media framing narratives on the boundary-making process of citizenship. Indeed, divergences between France and the United Kingdom’s approach to denationalisation were highlighted. The French punitive model-advancing return and prosecution- and the British pre-emptive model- enforcing

denationalisation and banishment- with regards to return of ISIS jihadists fall from each country's respective conceptions of citizenship (Fargues, 2017). In France, citizenship is defined as membership to a political community while the United Kingdom frames citizenship as membership to a safe society (Fargues, 2017; 2021; Gibney, 2020). Nonetheless, under international law, states are held unaccountable to certain prerogatives on citizenship deprivation regardless of their conceptualisation. The impossibility of rendering someone stateless complexifies the application and applicability of certain laws or decisions (Korteweg, Yurdakul, Sunderland & Streppel, 2023). As such, indecision and legal obstacles created a space for the media to debate and argue on the possible justifications for and critiques of denationalisation. (Koller, 2022; Korteweg, Yurdakul, Sunderland & Streppel, 2023). Amidst revisions on the inclusion or exclusion of certain individuals, scholars have identified a gendered and racialised approach used within liberal democracies on drawing the boundaries of citizenship. From a constructivist perspective, "the way we speak about things affects our material reality" (Jackson, 2019, p.1751). As such, delving into analysing how respective national media landscapes framed ISIS jihadists is crucial in two ways. On the one hand, it contributes to highlight if similarities and/or divergences between French and British media exist on their treatment of ISIS women discursively. On the other hand, considering the normative space constructed by the 'jihadi bride' metaphor, this thesis critically assesses how media discourses participate in shaping public understandings of citizenship. Specifically, it may prove helpful in evaluating how media sources include or excluded citizens along racialised and gendered lines.

Theory and Conceptual Framework

Conceptualisation of Citizenship:

In Western liberal societies, the conceptualisation of citizenship has significantly involved over time. After the Second World War, scholars identified a liberal trend of positive naturalisation policies and politics, in turn accompanied with a constrictive use or an outright disappearance of denationalisation powers (Joppke, 2010; Gibney, 2013; Mantu, 2015). As defined by British sociologist Thomas Humphrey Marshall, post-war citizenship came to be understood as “a status bestowed on those who are full members of a community. All who possess the status are equal with respect to the rights and duties with which the status is endowed” (Marshall, 1950, p.253). For long, citizenship was viewed traditionally in terms of a collective pact between individuals which come to form a community of fully-pledged members, referred to as citizens (Lazar, 2016). Over time, the meanings attached to citizenship have become increasingly politicised, describing more than an existing membership pact between a state and a person, on which several obligations, duties and rights are bestowed upon (Bohan, 2001; Dumbrava, 2016). In his book, *Nationality, citizenship, and Ethno-Cultural Belonging*, Costica Dumbrava contends and distinguishes various levels of meaning that citizenship incurs to its constituents (Dumbrava, 2016). In his view, the political dimension attached to citizenship in Europe dominates over legal and ethno-cultural aspects. That said, Dumbrava attempts to argue that the granting, possession and maintenance of citizenship lies not in the position of individuals vis-à-vis the laws of the state or their level of integration to a collective, but actually in the conditional consent reached by members to adhere to the national project (Dumbrava, 2016). If theoretically justifiable, fellow scholars have deemed this standpoint to lack complexity in addressing current debated issues faced by liberal democratic societies such as multiculturalism or the threat of ‘home-grown’ terrorism. It has also been critiqued for underplaying the increasing role played by the state in actually giving and monitoring consent of membership to a gained status (Ballin, 2014; Swider, 2016).

For some scholars, such as Hirsch Ballin, citizenship should be advocated and conceptualised as the right to membership to where a person considers its home lies (Ballin, 2014; Dumbrava, 2016). As framed by Christian Joppke, citizenship is closely intertwined to the right of residency as “the real prize- behind formal citizenship- is legal residency, not citizenship” itself (Joppke, 2010, p.10). In that sense, rather than believing citizenship alludes to the formation of an exclusive homogenised collective, some academics have advanced that

citizenship to a community, granting membership and status, is to resemble an individual contract vis-à-vis the state based on inclusion and less on cultural assimilation or ethnic uniformity (Joppke, 2010; 2015). Nevertheless, for Latvian constitutional judge Kristine Kruma, nationality is indissociable from the conceptualisation of citizenship, therefore making belonging to a wider community conditional on a consciousness of national history, identity and tradition (Kruma, 2014, p.115). As such, if dependent on identifying with a set of cultural practices and representations, the relationship sustained between the nation and an individual cannot be rooted on an unshakable and inalienable right to citizenship to be obtained by all (Kruma, 2014). In recent years, migration and citizenship scholars have increasingly debated on whether such a thing as a human right to citizenship exists (Swider, 2016). Liberal democracies' proliferation in Europe increased these countries' normative pressures to integrate at best and align non-citizens in acquiring membership for better subjection to state rules and an enhanced feeling of belonging (Dumbrava, 2010; Gibney, 2013). European nations who had large immigrant populations settled on their territories, understood it was "not whether to include immigrants, but rather how integration ought to be pursued" (Triadafilopoulos, 2011, p.865). In that times, traditional prerogatives for states to apply their own criteria in the distribution of citizenship subsided to include liberal norms of universalism and non-discrimination within membership, identity and belonging (Gibney, 2013). As the boundaries of citizenship were enlarged, this affected more than the legal tenets of citizenship possession and touched upon the symbolic meaning attached to citizenship (Joppke, 2010; Sykes, 2015; Fargues, 2017).

Matthew Gibney, professor of politics and forced migration at Oxford University argued that denationalisation was 'controversial' in the eyes of liberal theories of citizenship (Gibney, 2019, p.2551). As liberal democracies like Australia, Canada or the United Kingdom strengthened their denationalisation powers, scholars Rainer Bauböck and Vesco Paskalev identified four types of citizenship conceptualisations which emerged from a political theory perspective hoping to respond to the 'return of banishment' (Bauböck & Paskalev, 2015). In order to differentiate between different versions of citizenship, Bauböck and Paskalev discerned two axes which helped frame the normative conceptions of citizenship. They first looked at whose vested interests dominated amidst the process of loss of citizenship, that is between the State and the individual. Then, the type of relation under which the State and a citizen operate within was analysed and categorised between 'generic' or 'special' relationships. A 'generic' relation is meant to capture "the sense that States are more or less

free to select individuals as citizens or that individuals are more or less free to select States they want to become citizens of” (Bauböck & Paskalev, 2015, p.9). As for a ‘special’ relation, it depicts cases where citizenship derives from a designated attachment such as descentance or birth rights, or celebrated acts such as prior long-term residence or awards for bravery (Bauböck & Paskalev, 2015, p.9). On these foundations, connecting both dimension allows to recognise different conceptions of citizenship. These are illustrated across Table 1.

Table 1:

<i>Table 1:</i>		<u>Dominant Interests</u>	
		State	Individual
<u>Choice of relation between State and Citizen</u>	Generic	<i>State Discretion</i>	<i>Individual Choice</i>
	Special	<i>Ascriptive Community</i>	<i>Genuine Link</i>

On the one hand, if a state-citizen relation is considered generic, a distinction is made between a ‘state discretion’ versus an ‘individual choice’ binary. Here, the former contention views citizenship as owned by the State’s own judgement. In other words, a democratic and sovereign legislature, in the name of ‘internal democratic self-determination’, sets the rules under which citizenship befalls. The opposed contention views citizenship as held by the individual whose autonomy should be protected by the State. It thus creates an “individual entitlement that is held against the State and that does not leave much scope for deprivation powers’ (Bauböck & Paskalev, 2015, p.10). It is worth mentioning, while deemed theoretically just, scholars have criticised the lack of practical applications to sustain this vision of citizenship as it seriously underplays the growing authority played by liberal democracies (Gibney, 2013; Macklin, 2014; Mantu, 2015).

On the other hand, a state-citizen relation considered as ‘special’ allows to envisage citizenship as either involvement through an ‘ascriptive community’ or a ‘genuine link’. Described as a relationship between both parties “in which neither side exercises much choice”, the membership into an ‘ascriptive community’ is based on objective criteria under which the

State and concerned citizen operate (Bauböck & Paskalev, 2015, p.11). Namely, participation into a political community is not forcibly chosen but dealt through ‘automatic determination’ based on circumstances invoked by the State (Bauböck & Paskalev, 2015). If ascription remains largely applied across modern citizenship laws, it has been judged to allow the perpetuation of ethno-cultural conceptions of citizenship. Indeed, in the case of denationalisation, the objectivity of criteria is interrogated amidst observed differential treatment according to an individual’s social background (Bauböck & Paskalev, 2015). Now, a ‘genuine link’ conception of citizenship departs from the assumption that the State and citizen possess a special relation. Yet, its specificity is that it is the individual’s own agency is mobilised to determine the ties one person develops with (a) particular State(s). From this point on, the individual with ‘genuine’ intentions, and who can prove it, should be included within the formed political community (Bauböck & Paskalev, 2015, p.12). If these different normative conceptions are not mutually exclusive and intertwine themselves greatly within liberal democracies’ views on citizenship, the ‘genuine link’ vision of citizenship is regarded as the most preferable from a democratic perspective. Indeed, since ascriptive views do not reason with an individuals’ capacity to choose, they sustain a model of ‘automatic attribution to adults without their consent”, this deemed as “contrary to democracy as a collective self-government authorised by autonomous individuals” (Bauböck & Paskalev, 2015, p.12). Nevertheless, Bauböck and Paskalev noted that such a normative conception of citizenship blurs the implications brought by deprivation of citizenship regimes and hardened its justification. As argued, motivations for denationalisation reside in the lack of ‘loyalty’ or in the failure of one’s duties. While the burden of justification for involuntary loss has been cast more on the State rather than the individual, ‘the genuine link’ approach does not clearly answer if lack of loyalty translates automatically into a lack of ‘genuineness’ (Bauböck & Paskalev, 2015, p.34).

Media Representation and Framing Theory:

Amidst the rise of Islamic Terrorism since 9/11, media sources have extensively covered and debated the topics of radicalisation of individuals, perpetrations of attacks and reactions for Western societies to this novel threat. Specifically, in the wake of ISIS’ downfall in 2019, European media sources focused on the possible returns of ISIS female members (as well as their children) who had left their home countries to join the terrorist organisation. At that point, news channels operationalised the perception of this phenomenon through a particular set of stereotypes which fall under the umbrella term ‘jihadi bride’ (Martini, 2018;

Mohammed, 2020, Jackson, 2019; Krona & Caskey, 2023). This particular representation produces a plethora of symbolic discourses which ‘framed’ how these women were and still are presented and perceived (Krona & Caskey, 2023, p.3). In that sense, the analytical framework, under which this thesis operates, relies on a theoretical understanding of the media’s pivotal role in agenda setting and creating ‘interpretative frames’ through which a phenomenon or issue is understood (Krona & Caskey, 2023, p.3).

In *Framing as a Theory of Media Effects*, Dietram Scheufele recalls how Robert Entman referred to ‘framing’ as “a scattered conceptualisation” where researchers lacked a clear definition and draw out context-specific theoretical frameworks (Dietram, 1993; Scheufele, 1999). On these grounds, Scheufele proposed to outline the theoretical premises of media framing. First, it was defined research carried out specifically on observing media effects was embedded within ‘social constructivism’. Namely, it was convinced that mass media has a strong impact on popular understanding since it is actively constructed social reality (Scheufele, 1999). Indeed, the role of the media is to position and frame images of reality “in a predictable and patterned way” (Scheufele, 1999, p.105). Second, Scheufele argues media effects can only be considered and measured amidst the interaction between the media and its listeners or viewers. In that sense, the discourses diffused through media framing belong to “the process by which individuals construct meaning, and public opinion is part of the process by which journalists develop and crystallise meaning in public discourse” (Scheufele, 1999, p.105). The theory behind looking at media framing stems thus from the observation made by academics that media outlets “tell people both what is important in the world around them and how to think about the events and people who inhabit that world” (Yusof, Hassan, Hassan & Osman, 2013).

Third, Scheufele distinguished two separate conceptualisations of framing which ought to be discussed. As frames constitute structures which present and help comprehend the world, media frames, as well as individual frames exist (Scheufele, 1999). The latter relates to the “mentally stored clusters of ideas that guide individuals processing of information” (Entman, 1993, p.53) and depict, for instance, the long-term political views which accompany an individual’s decision-making. Media frames, on the contrary, relate to “the central organising idea or storyline which provides meaning to an unfolding strip of events” (Scheufele, 1999, p.106). In that sense, the agency of meaning from an event or happening does not rely with the individual. It actually relies with the journalist which identifies, classifies and selectively picks

information in such a way to offer an effective ‘snapshot’ of the issue to audiences. To explain further, Entman described that “to frame is to select some aspects of a perceived reality and make them more salient in a communicating text, in such a way to promote a particular problem definition” (Entman, 1993, p.52). Here, media frames effectively help individuals’ capacities to understand the issue at hand. It also serves the possibility to feed the construction of individuals’ own personal frames. As such, framing an issue, firstly through the media, plays an incremental role on structuring debates and visions of a development, if political, societal or ideological. Moreover, it cannot be overlooked that media frames come from somewhere and someone. If mostly journalists, politicians or academics, all possess personal biases which affect the way a media frame turns out. Based on previous research, Scheufele indicated five factors potentially influence how journalists routinely frame an issue. First, (1) societal norms, values and biases impact how an issue is addressed. Second, (2) personal constraints often play a role on writers or speakers’ abilities to detail an issue or a topic. Time or organisational pressures to treat and disperse information are noticeable examples in explaining the need for repetitive frames. Third, (3) simple routines also are identified in order for journalists to treat issues efficiently, as well as make an issue feel more recognisable and accessible. Four, (4) media frames also benefit from interest groups’ advice or inputs. Writers or speakers attempting to capture an issue rely on experts in a domain to offer a snapshot over the topic at hand. Lastly, (5) ideological or political orientations of journalists and newspapers editorial teams play a central role on understanding the way an issue was framed (Scheufele, 1999).

Finally, after considering the conceptual nature of the frame-in-question (media or individual), it is crucial to consider whether the observed frame is examined as an independent or dependent variable. If studied as an independent variable, the effects of the said-frame applied on (dependent) audiences would be of interest. Ultimately, academics would attempt to research the impact of (media or individual) frames on attitudes, opinions and individual frames (Entman, 1993; Scheufele, 1999). Yet, in the case of this research, the media frame constructed around ISIS female fighters is treated as a dependent variable. Indeed, as the analysis pertains to observing what shapes the media frame, it is trying to look at the role of various factors in influencing the creation or alteration of the frame-in-question. In that sense, the constructed ‘jihadi bride’ media frame is unpacked in order to distinguish and consider the factors, models or concepts which effect these women’s relation to citizenship deprivation thereafter. For Scheufele, when investigating the media, it is worth remembering that frames modelled by journalists are themselves shaped by several social-structural or organisational

variables, as well as by individual and ideological frames (Scheufele, 1999, p.106). Indeed, Scheufele concurred, as well with Edelman that a media frame was largely “driven by ideology and prejudice”, but also with Gamson and Modigliani, that a media frame comes down to the “interaction of journalists’ norms and practices and the influence of interest groups” (Edelman, 1993, p.242 ; Scheufele, 1999, p.110). As such, Scheufele recommends to consider two research questions which abide along carrying out a frame analysis in such a manner. First (1) what factors influence the way journalists or other societal groups frame a certain issue? And second, (2) how do these processes work and, as a result, what are the frames that journalists use? (Scheufele, 1999, p.108).

Methodology

Case Analysis:

It is this thesis' intent to analyse the role that gender and race play on the construction of the 'jihadi bride' media frame, specifically vis-à-vis its relation to the concept of citizenship deprivation. As it stands, gender and race are understood to influence the relation which is imagined between the State and an individual (Martini, 2018; Jackson, 2019; Korteweg, Yurdakul, Sunderland & Streppel, 2023). Nonetheless, it is of particular interest here to situate how ISIS female fighters' citizenship, influenced then through gender and race amongst other factors, is being framed throughout media debates on denationalisation. To do so, the analysis will take into account and apply Paskalev and Bauböck's normative citizenship conceptualisation framework (Paskalev & Bauböck, 2015). As such, a frame analysis seeks to deduce whose vested interests are framed as dominant throughout the process of citizenship revocation. Also, it attempts to distinguish whether a 'generic' or 'special' relationship between an individual and the State prevails across the 'jihadi bride' media frame. Thereafter, such an analysis is aimed at characterising the role gendered and racial attributes have on shaping the media's framing of the issue at hand. Also, considering the dominant type of citizenship accolated to ISIS female fighters, it is worth discussing and interpreting the impact of such frames on perceived citizenship rights. Indeed, media frames may participate in the (possible) changing nature of citizenship acquisition and deprivation which ensues throughout both national contexts observed.

Now, the choice to focus and analyse the treatment of ISIS female returnees in the British and French media landscape stems from two distinct points. On the one hand, it is deemed admissible and beneficial to offer a comparison of both cases, from which precious learnings can be drawn, as done in previous researches focusing on these countries' divergent approach to citizenship stripping (Fargues, 2017; Mantu, 2018; Pougnet, 2023). On the other hand, the lack of research purporting to the French media framing of ISIS female returnees, especially in comparison to the research given to the UK's 'ISIS jihadi bride' frame, gathers the conditions for filling a gap in the literature. Arguably too, the existing comparison between the UK's and the Netherlands' media landscapes with regards to ISIS female members comforts the possibilities of gathering key and viable findings (Korteweg, Yurdakul, Sunderland & Streppel, 2023). As such, after giving instructions over the operationalisation of citizenship,

this thesis' analysis will be presented twofold. On the one hand, differences and similarities on how citizenship is framed throughout both national media landscapes, covering the whole political spectrum, will be unpacked. On the other hand, a comparison between France and the United Kingdom will focus on drawing on similarities and divergences from both countries' respective political leanings media landscape.

Operationalisation:

As best described by Leonie B. Jackson, “frames can be understood as organising ideas that operate both within the mind and within texts and consist of a set of shared, taken for granted beliefs to which the majority of a given society subscribes” (Jackson, 2021). Indeed, through metaphorical and symbolic understandings organised in familiar and systematic ways, media frames “influence the way this information is processed, interacting with people's personal experiences and cognitive models of how the world works” (Jackson, 2021). As such, chosen articles were analysed through the software program MAXQDA and approached as follows. Firstly, each article was open-coded to carve out the dominant and persistent metaphorical and symbolic expressions which helped build the observed frame. That is, metaphors, depictions, repetitive examples or links to precise events, catchphrases, particular words or phrases were denoted. Secondly, the various descriptions and reports obtained were gathered into a handful of codes which enabled to draw how citizenship is framed for these women. Specifically, three main categories were identified which operationalise the concept of citizenship, as presented in Table 2. First, the metaphorical value attached to the relationship maintained between the State and the individual is analysed. It englobes expressions of either genuineness (through mentions of change, forgiveness and accountability) or suspicion (through labels such as deceitfulness, falsehood and inculpability). Second, the symbolic value which is attached to the identification of an individual vis-à-vis wider society is observed. As such, detections of either resemblances or differences between an individual and its national counterparts are detected. These are expressed through mentions of either attachment and fidelity to shared values and a particular accepted way-of-life, or a distance and disloyalty to the principles guiding the wider community. Third, the last code looks at the positionality of others, that is the wider society, in endorsing the State's stances. That is, exposures to statements on the responsibility for care, duty and the rule of law are remarked, along with accounts of the need for protection and calculated risk over legal provisions. Lastly, in order to denote the effect of gender and race on the conceptualisation of citizenship at play, the denomination coined by Laura Sjoberg of ‘*Monster, Mother, Whore*’

constituted an excellent method to approach the various articles and oversee if particular framings of citizenship were attached to particular framings of these women. Through comparing the frequency of each codes, as well as denoting clear standouts of particular ‘textual building blocks which work to construct particular storylines”, various observations were realised along the political-leanings of the different media sources analysed.

Table 2:

Table 2		Operationalisation of Citizenship using Paskalev & Bauböck's Model				
	<u>Relation between the State and a Citizen amidst Tension:</u>		<u>Citizen's Vested Interests as Identification vis-à-vis the Community:</u>		<u>Endorsement of Society over the State's Vested Interests:</u>	
Code:	<i>Generic Relation</i>	<i>Special Relation</i>	<i>Attachment Home</i>	<i>Foreign Portrayal</i>	<i>Legal/Ethical Traditions</i>	<i>Populist/Protectionism</i>
Category:	Change, Mercy and Liability.	Deceit, Falsehood and Blame.	Similarity, Replication of Western Values and Fidelity to 'way-of-life'.	Difference, Distance from Homeland, Disloyalty to Western Values	Duty, Plea for Care and Primacy of Rule of Law	Politics and Feelings Over the Rule of Law, Need for Protection
Gendered and Racial Code:	<i>Portrayal as 'Monster'</i>		<i>Portrayal as 'Mothers'</i>		<i>Portrayal as 'Whore'</i>	
Category:	Senseless Women, Responsible Individuals and Cruel Complicit.		Corrupt Parent, Failed Mother.		Imprudent Little Girl, Influential Housewife and Irrational Women.	

Case Selection:

Throughout the literature covered across this thesis, media and terrorism are treated as holding a ‘symbiotic relationship’, namely that both are interdependent from one another (Nacos, 2005; Martini, 2018). Indeed, scholars such as Brigitte Nacos have tackled how terrorists make use of the media, and reciprocally, how the media exploits terrorism to gain favourable audience ratings (Nacos, 2005; Martini, 2018). That is, on the one hand, as Margaret Thatcher famously declared, “the media provides the oxygen of publicity” which terrorism searches for (Martini, 2018, p.462). On the other hand, media channels ‘crave’ the exceptionality, the shock element and dramatic effect which terrorist events produce, because it draws viewers and listeners in (Nacos, 2005; Martini, 2018). Perfectly exemplified through the case of Shamima Begum in the United Kingdom and Emilie König in France, media channels sustained a deep interest for a handful of ISIS female members, the so-called ‘jihadi brides’. Through daily news articles, opinion pieces, documentaries, podcasts or interviews, media outlets offered a complete ‘storyline’ of these women’s experiences (Masters & Regilme, 2020; Webber, 2022; IHEDN, 2024). According to Shakira Hussein, the phenomenon of ‘ISIS brides’ gained traction as it symbolised ‘one of the many apparent contradictions that made ISIS appear bizarre and novel’ to the public (Martini, 2018). Namely, Western audience had to make sense of Western women leaving to join an entity which seemed foreign, dangerous and actively pursuing the destruction of the ‘West’. Ultimately, choosing media sources as the basis of this thesis’ source of analysis enables to look into and understand the boundary-making processes applied onto readers and that reporters reproduce when interpreting the ‘jihadi bride’ frame (Martini, 2018). Here, media discourses released through their initial framing shape and frame how socio-political issues are ‘actively’ built and conceived by people.

Across European media outlets, texts and illustrations gathered across articles can reveal “power relations, ideological tensions, and analytical frameworks that construct who is seen as part of or separate from the national community” (Korteweg, Yurdakul, Sunderland & Streppel, 2023, p.1004). Indeed, looking back at Benedict Anderson’s work, he addressed the impact the invention of printing had, as a commodity, in helping the creation of national boundaries. Still to this day, national media landscapes play an important role on the “promotion and maintenance of national identity”, along with the “formation of national consciousness” (Lahey, 2023, p.23). This thesis proceeds then to reflect on the narratives created on ISIS female members to justify or critique

the decision to strip them from citizenship. Given the media attention purported to Shamima Begum’s and Emilie König’s stories, it is argued these women’s cases served as ‘referent objects’ to epitomise the ISIS female members from Europe (Masters & Regilme, 2020; Webber, 2022). As such, choosing Shamima Begum and Emilie König as case studies to observe French and British media landscapes in this thesis stems from the extensive coverage done. Considering the number of articles written about these women respectively, it is far too ambitious to ensure an extensive analysis could be realised.

Table 3:

Table 3		Period of Time Covered for each Case Study		
Name:	Time:	Start Date (=Reappearance in Media):	End Date (=Latest Decision on Repatriation Status)	Total of time:
	Shamima Begum (United Kingdom)		13 Feb 2019 (=Found in Syrian prison camp).	23 Feb 2024 (=UK Court rejects Begum's Appeal against Citizenship Revocation).
Émilie König (France)		02 Jan 2018 (=Captured by Kurdish Forces).	06 Jul 2022 (=Repatriation by French Government).	54 months, 5 days.

Ultimately, in an attempt to offer a balanced, objective and justified approach, the case selection process was conducted through hand-picking news media articles across various sources. First, it was deemed beneficial to focus on weekly-published and widely-accessible newspaper magazines. It enables to effectively keep a balance between sources based on their ideological positions. It also ensures they possessed similar readership numbers. Furthermore, news sources with limited coverage of the selected cases, that is less than ten articles, were judged irrelevant. Second, only hand-picked news media articles with these women’s name within the title or pictures heading it were chosen since they related directly to these women’s trajectories and enabled to reduce the pool of articles. Thirdly, the period of time covered is different to fit both women’s full trajectories, from their (re-)appearance and request to return ‘home’ until their latest decision on their status. Both time frames cover approximately 55 months respectively, that is 4 years and a half. Table 3 better illustrates these time parameters. For Emilie König, the time span chosen started from

2 January 2018, when France learned of her capture by Kurdish forces, until her repatriation on 5 July 2022. For Shamima Begum, articles viewed date from 13 February 2019 when British media announced Mrs Begum had been found, until 23 February 2024, date the UK Court of Appeal rejected her appeal against the decision to revoke her citizenship.

Table 4:

Table 4	Article distribution by newspaper magazines (political leanings)			
United Kingdom:	<i>The Observer</i> (left-leaning):	<i>The Sunday Times</i> (centre-right leaning)	<i>The Sunday Telegraph</i> (right-leaning)	Total, (%):
	5	10	9	24, (60%)
France:	<i>Le Nouvel Observateur</i> (left-leaning)	<i>Le Point</i> (centre-right leaning)	<i>Valeurs Actuelles</i> (right-leaning)	Total
	7	5	4	16, (40%)
				40, (100%)

Moreover, the choice to study a variety of sources, in terms of their political leanings, is also purposefully done to reflect on the possible divergences and similarities drawn between the French and British media treatment of the ISIS ‘jihadi bride’. It will enable to add a layer of observation upon how media framing operate (differently) throughout different political ideologies. Furthermore, it could highlight the narratives emphasised from the ‘jihadi bride’ frame which helped draw justifications or critiques mechanisms on denationalisation. The following Table 4 aims to illustrate the various newspaper magazines sources chosen. In the case of the UK, the main and most read political Sunday’s newspaper magazines were selected to create a case for Shamima Begum: the left-leaning *The Observer*, the centre-right leaning *Sunday Times* as well as the more right-leaning tabloid *The Sunday Telegraph*. In the case of France, the main and most read weekly-newspaper magazines, published every Thursdays, were chosen to create a case for Emilie König: the *Nouvel Observateur*, a left-leaning news magazine, then *Le Point*, a centre-right oriented publication and *Valeurs Actuelles*, a (far)-right leaning newspaper magazine were chosen.

Analysis

The United Kingdom's 'safe haven' model in turmoil:

As previously mentioned, the United Kingdom has a tendency of framing citizenship as membership to a 'safe' society (Fargues, 2017; 2021; Gibney, 2020). The UK Government's latest Immigration Bill in 2023 named "Secure Borders, Safe Haven" testifies of its attachment to ensure a "secure environment for social inclusion and sustainable growth for all" (UK Home Office, 2023). In this context, the decision of the UK Government to strip ISIS female members of their citizenship, deemed as dangerous and risky individuals, seemed to assent this belief. Nevertheless, across the British media landscape, through the systematically used media frame 'jihadi bride' or 'ISIS bride', opposing visions of citizenship arise. Indeed, if there is a general agreement over the fact the State's vested interests are to be prioritised, the meanings attached to the frame 'jihadi bride' differently define the relationship which the State and the individual maintain. Indeed, politically left-leaning sources appear to remain attached to an 'ascriptive community' model, based on the presumption of a clear and outlined 'special' link. On the opposite, right-leaning media outlets have moved towards defending a new standard in favour of further 'State discretion', where the upheld 'special' relation turns 'generic'. Overall, gendered and religiously-discriminating (leading to racialised) visualisations of British citizenship are overwhelmingly present and uphold such a conceptualisation of citizenship.

a) Shamima Begum versus the UK Government: a Suspicious and Deceitful Individual

According to *the Sunday Times* and *the Sunday Telegraph's* reporting, Shamima Begum unequivocally lost her rights to be a British citizen because as she lacks genuineness and is regarded as deceitful vis-à-vis the United Kingdom. Through the 'jihadi bride' frame, evidence of gendered and religious stereotyping describing Shamima Begum as a deceiving and irrational woman stand out. Across the nineteen (19) articles examined from *the Sunday Times* and *the Sunday Telegraph*, thirty-five (35) mentions recounting Shamima Begum's monstrous and senseless actions were counted. Five articles from *the Sunday Telegraph* reiterated how Begum was alleged to have "stitched suicide bombers into explosive vests". *The Sunday Times* even dedicated an entire article on that matter entitled: "UK jihadi bride Shamima Begum 'prepared suicide bombers'". The use of the 'jihadi bride' frame enables to associate Begum's irrational decision-making, her senseless responsibility and endorsement of the horrors perpetrated by ISIS to her portrayal as a 'monster'. *The Sunday Times* and *the*

Sunday Telegraph also referred consistently to Shamima Begum's role within the Islamic terrorist organisation. Adding a new layer to the 'jihadi bride' frame, her position as a complicit housewife stands out, as one of her endorsing (as a wife) the despicable activities committed by ISIS (to whom her husband belongs): "Begum had carried a Kalashnikov rifle and had a reputation for being strict on women she thought were behaving in a "non-Islamic" way", "she was allowed to carry a Kalashnikov rifle and earned a reputation as a strict "enforcer" of Isil's laws, such as women's dress codes", "(she was) being such a good and obedient servant of Isis that she was entrusted with her own Kalashnikov" (*the Sunday Times*); "she was seen (...) carrying a Kalashnikov and earning a reputation as strict morality police 'enforcer' over other women", "she had served in the terror group's "morality police" to help enforce strict rules among female members" (*the Sunday Telegraph*,). Another point to mention is the vision of Begum having espoused and still espousing an ideology which has committed atrocities in the United Kingdom. Five mentions of her comments on the Manchester bombing attacks, committed by ISIS in 2017, posits her as "remorseless", "cruel", "sociopathic" or "despicable" (*the Sunday Telegraph*, *the Sunday Times*). Overall, it is clear the use of the 'jihadi bride' frame here is to present Shamima Begum as risky and dangerous woman. For the centre-right and right of British politics, it justifies her loss of vested interest in concerns over her citizenship. As previously mentioned, the first step into this analysis pertained to depict how the relationship between the State, that is the UK Home Office, and the individual, Shamima Begum here, was envisioned. Clearly, her dishonest appearances motivated the State to take ownership of her citizenship, as well as the relation it sustains with her and other 'jihadi brides'.

As Paskalev and Bauböck theorised, the relationship between the State and an individual may be one that is 'special'. Namely, it is perceived as a unique, rewarding and a personal link. This relation can be 'generic', that is one that is meaningless, disposable and unprotected. Through the 'jihadi bride' frame, *the Sunday Times* and *the Sunday Telegraph* highlight the lack of genuineness exuding from Begum, thus recalling her monstrosity and perfidy. Unmistakeably, their distrust of Begum as a person is reflected across her malicious attempts to return to the United Kingdom: "she seemed prepared to lie about almost anything except how she really felt", "if I'd spent the past few years in a prison camp, I'd say anything if it increased my chances of getting out", "it wouldn't be mad to think this is the remorse of convenience" (*the Sunday Times*,). Interestingly, both news magazines have pre-emptively opposed notions and meanings otherwise attached to the 'jihadi bride' frame, ones of treating Begum as a 'celebrity' or further 'infantilising' her: "one minute we're saying it's OK for 15-

year-olds to decide to cut their breasts off, the next we're infantilising Begum", "the Isis bride's youth and looks should not blind us to her despicable actions" (*the Sunday Times*). By disseminating these remarks, the 'jihadi bride' as a responsible and remorseless monster remains front-and-centre. Here, a vision of citizenship capable of reacting to such threats, one that is 'generic', is thus advanced. Ultimately, several rhetorical questions concur with the difficult decision done by British government and about the need to further interrogate the status-quo envisioned: "do I believe in Begum's U-turn? Not Really" or "do I feel sorry for her? only on the account of her dead babies" (*the Sunday Times*). In all, Begum's representation allows to confirm the 'jihadi bride' frame is conceptualised under State authority, carried out in discretion and without repentance from its custodian.

Right-wing press exploits the 'ISIS bride' media frame to their advantage. On the contrary, left-wing media sources such as *the Observer* appear to fail to mobilise against such a frame which, subsequently, extends influence and acceptability to news magazines such as *the Sunday Times* or *the Sunday Telegraph*. Indeed, left-wing politics are believed as better positioned to address addressing gendered, religiously-discriminative or racialised images which reshape the construction of citizenship. Still, the overall lack of mention over Shamima Begum's possible genuineness or forgiveness is outstanding. Additionally, small remarks acquiesce with the framing of 'ISIS brides' as dangerous and risky, therefore unentitled to see their vested interest surpass the State's: "whatever the risk this young Isis supporter may pose" or "however monstrous her actions in Syria" or "her support for a terrorist organisation that has committed unspeakable atrocities means she has much to atone for" (*the Observer*).

b) Shamima Begum in the United Kingdom: a Foreigner at Home?

For *the Observer* does not seem to refute the belief that the State possesses full vested interests on citizenship, recalling Shamima Begum's links and attachment to the United Kingdom enable to maintain her as an individual part of British society. Doing so, by extension, upholds 'jihadi brides' as citizens of their respective countries. Indeed, assuming Begum's British identity helps support her perception as a citizen (whether desirable or not) whose rights cannot be stripped only by the State's decision. Throughout the articles sampled from *the Observer*, 57 references to Shamima Begum being 'British' or born in 'Britain' are made. Here, forced repetitions instil a sense of attachment: "Begum, 20, was born in Britain and brought up in Britain, (...), she remains someone to whom Britain has legal and moral obligations. Begum

should be answerable for her jihadist activities – in a British court” (*The Observer*). Furthermore, *the Observer*’s consistent reminding of Shamima Begum’s home, Bethnal Green in London, and reporting done in her local authority localises the ‘jihadi bride’ not as a ‘foreign object’, but one in close vicinity to the United Kingdom (whether liked or not): “outside east London mosque on Saturday, few people wanted to discuss Begum’s situation”; “in a Punjabi cafe in Whitechapel, a family of four were split in their views” (*The Observer*). Moreover, if asserting Begum’s claim to return to the United Kingdom is because of her citizenship, the ‘jihadi bride’ frame overwhelmingly communicates over Begum’s position as a mother, a British mother: “She is a British citizen, about to give birth to an innocent child who will be a British citizen by descent”, “(Sajid) Javid confirmed last month that Jarrah was a British citizen”, “opportunism has other costs, including (...) the death of unprotected innocents, in this case a vulnerable British baby”, “I’ll do anything required just to be able to come home and live quietly with my child.” (*The Observer*). If the ‘jihadi bride’ frame mobilises references to motherhood, the capacity for women to transfer their citizenship to their newborn is utilised to justify of Shamima Begum’s citizenship. Indirectly, it allows to recall that where citizenship is directed by laws and rules decided by the State, universally applied and where removal proves troublesome. In other words, as illustrated by Paskalev and Bauböck, citizenship is envisioned as an ‘ascriptive community’. Interestingly, it is already worth pointing out the impact of the death of Begum’s son on her justification for repatriation: “that was a baby’s life. He punished an innocent baby”; “an innocent child has died as a result of a British woman being stripped of her citizenship” (*the Observer*). If evidently highlighting her attachment to the United Kingdom because of her son, it presumes her ‘lack of motherhood’ now hindered her chances to justify for repatriation.

For *the Sunday Times* and *the Sunday Telegraph*, the death of Begum’s son was met with tragedy by journalists. Nevertheless, it was clearly related to the ‘jihadi bride’ frame through Begum’s failed motherhood. This means, Begum was imagined as a failed and corrupt mother, who could not take care of her children : “she had three children, all of whom died”; “she married an Isis fighter with whom she had three babies, all of whom died”; “she was mourning the death of her two children (...) then her third child died” (*The Sunday Telegraph*); “her son Jarrah died in a Syrian camp last month aged three weeks”, “it was only at the end, after her son died, that she wanted to leave” (*The Sunday Times*,). On such grounds, her incapacity to do the best for her children, along with the fact they died, were evermore reasons not to allow for her return. Her lack of children, representing a possible future at home, cuts

short possible attachments to the United Kingdom This said, the primacy and overwhelming use of the motherhood component in the conceptualisation of citizenship for ISIS female fighters is outstanding: “I just was hoping that maybe for the sake of me and my child they let me come back” (*The Sunday Times*).

Now, in addition to her failed motherhood, *the Sunday Times* and *the Sunday Telegraph* utilise the ‘ISIS bride’ frame to enhance Shamima Begum’s estrangement to the United Kingdom. Indeed, for what the ‘jihadi bride’ frame symbolises, it is understood as a new identity englobing the individual. It forces one to leave its past lives behind, even if conceptualised as ‘special’ before: “once predicted to achieve top marks in her GCSEs”, “the once London schoolgirl”, “the schoolgirl who, aged 15, left her East London home in 2015 for Syria to become an Isis bride” (*The Sunday Times*). In this case, Shamima Begum’s citizenship is imagined to have been gone since she ‘endorsed’ ISIS and ‘self-sabotaged’ herself. Begum is portrayed as treacherous and disloyal, unaligned with assumed British values, ideals, or beliefs: “she is someone who has declared war on her country – someone who has spurned it in the most hostile way imaginable, crossing continents to take up arms against the West”, “Shamima Begum betrayed Britain and she should face charges of high treason”, What is the correct way to deal with British citizens who travel abroad to attack our allies and our interests – who, in plainer language, betray us?” (*The Sunday Telegraph*). For *the Sunday Telegraph*, as it mentions high treason and betrayal, it resounds as a legitimising factor to strip the ‘ISIS bride’ of her citizenship. Clearly, Begum’s suspiciousness and dishonesty, albeit resembling treacherous behaviour, render her incompatible to be included within British society.

Another point to make about the ‘jihadi bride’ frame, and the subsequent symbols which transpire from it, involves the importance of representation. In both *the Sunday Times* and *the Sunday Telegraph*, allusions to Shamima Begum’s makeover are noted at several occasions: “with her straightened hair and Western clothing, Ms Begum today looks nothing like the niqab-clad teen who became the poster child for Britain’s so-called “Isil brides”, “today she looks more suited to a shopping trip on Oxford Street than life in a camp for hardened jihadists” (*The Sunday Telegraph*); “that was only two years ago, and Begum was interviewed wearing a black hijab; in other interviews she had worn a niqab with the veil pulled back from her face. On all those occasions she wore a black jilbab, a loose sort of coat-dress. Last week she appeared on ITV wearing a Nike cap and a vest top, with long, loose hair and fluorescent orange nails. Asked about it, she said she “didn’t feel like myself” in the hijab.” (The Sunday

Times). From these statements and representations, Begum's change of heart is reflected in her appearance and her attachment back home through dressing as a young 'British' woman. Evidently distancing herself with her 'Jihadi Bride' frame, her makeover already entrenched along gendered, religiously-discriminative (wearing a Black hijab would be un-British) and racialised lines, is not taken seriously: "clothes do send a message, and the intention here was to suggest she was throwing off her former beliefs along with the hijab and reverting to the self she would have become if she hadn't left Bethnal Green as a schoolgirl. That self would have a British passport, would probably be a recent graduate — she is not stupid, which only makes things worse — would not have joined a death cult and effectively become a sex slave, and would not have three dead children" (*the Sunday Times*); "Shamima Begum seen in Western clothes as she seeks break with IS past" (*the Sunday Telegraph*,). Here, the evidence of her 'becoming' a foreigner to her country is evident as the verbs "was to suggest" "seeks" carries a weight of suspicion about her true intentions. *The Sunday Telegraph* even goes further: "the Isis bride's youth and looks should not blind us to her despicable actions" (*the Sunday Telegraph*). Catalysing the reader's mind on the 'monstrous' element of the 'jihadi bride' frame goes hand-in-hand with the defended vision of citizenship. One where the State ought to decide on citizenship rights, one where deprivation is acted swiftly, one where refutation or claims of prejudicial treatment from deprived citizens are easily shunned.

c) a Duty to Protect Shamima Begum or Protection of the United Kingdom as a Duty

A last component of the 'jihadi bride' frame which impacts the conception of citizenship is how the interactive nature of citizenship is captured, that is how responsibility and loyalty are envisioned by other members of the community towards one another. Following the logic of an 'ascriptive community' entails the necessity for the State to set objective criteria which following universal and accepted norms. Namely, citizens part of this system argue actions and events do not and should not rock citizenship. Altogether, society should, endorse a responsibility of care and duty to all. According to *The Observer*, the responsibility of care responds to the overwhelming identification of Begum as an 'exploited victim', 'undoubtedly vulnerable' or 'a teenage girl'. The 'jihadi bride' frame reflects here the story of a groomed young girl who was trafficked into ISIS, married off and who remained a housewife during her time under ISIS. It even dedicates a whole article on it: "Shamima Begum: Canada would back Islamic State 'trafficking' inquiry" (*The Observer*). In that sense, the gendered perception of women as 'passive' and observed through the 'prism of men' relates directly to the need to

protect the vulnerable, the young and, as such, allow for Shamima Begum to return. Moreover, *The Observer* aligns itself on the vision of citizenship as ascription, thus on acquired stakes and duties for the citizen, as well as for the State. Across *the Observer*'s articles, journalists mobilised the rule of law and the United Kingdom's legal obligations: "UK must act based on its obligations under the rule of law and its duty to keep British citizens safe", "Begum remains a British citizen, and the Geneva conventions proscribe governments from making their citizens stateless", "a civilised country acknowledges its own citizens, whatever their actions" (*The Observer*). In effect, *the Observer* warns over reproducing the monstrosity the 'jihadi bride' itself is framed around. By taking a higher moral standpoint, the 'jihadi bride' frame sets Begum as undesirable, yet tied by citizenship to the United Kingdom through an unshakable bond. Interestingly, *the Sunday Times* seems to have grown more undecided and ambivalent about its own positioning vis-à-vis the 'jihadi bride'. While backing the argument of the State holding its vested interests, the position taken by some articles of the newspaper magazine directly collide with this contention. Titles have oscillated between "Shamima Begum's remorse is a sham", "Shamima Begum's father says Sajid Javid right to take her passport", "If you run away to join Isis, like Shamima Begum, I will use all my power to stop you coming back" and "Monsters must face justice. If Britain is a proper country, it will put Shamima Begum on trial", "Shamima Begum has nowhere to go but here" (*the Sunday Times*). In the latter, journalists point to similar arguments than *the Observer*. That is, even if difficult to identify with 'Britishness', Begum remains a British subject under international legal provisions and ethics. The importance attached by *the Sunday Times* of dealing with these women under the normative conditions set across the globe are portrayed as paramount. Overall, the ambivalence of *the Sunday Times* has exemplified the duality and polarisation that the 'jihadi bride' frame can cast and its malleability also.

For *the Observer* and some parts of *the Sunday Times*, the notion of citizenship as an 'ascriptive community' translates itself through the repeated metaphors embodying 'duty', 'moral', 'responsibility' or the 'rule of law'. Captivatingly, the 'jihadi bride' frame encapsulates also how other citizens, in reciprocity, view theirs: "it is about the nature of citizenship and the meaning of moral responsibility. It is also about how far we are willing to sacrifice moral obligations on the altar of political expediency". Evidently, this last statement reacts to the position taken by the British government and, indirectly, much of the reporting of *the Sunday Telegraph* and *the Sunday Times*. For the other camp, citizenship ought to stop being a constant and become much more ruled through popular sentiment interpretation,

internal politics and short-term ideological decision-making by the State: “ What kind of a regime merrily robs people of their status? Is it a civilised, mature society, or is it a despotic, insecure, failing state?”, “whichever way you look at it, this is not a legal decision; it’s a political one”, “if we were going on emotions alone, I’d happily see her rot on the basis of a mere fraction of the awful things she has done” (*The Sunday Times*); “the only purpose it serves is virtue-signalling how tough Javid is on radicalised teenagers sympathetic to terrorism”, “it is for the justice system, not for MPs and a social media mob, to determine the extent to which she is a victim or a perpetrator. And it is for the intelligence services to determine the extent to which she is a security risk.” (*The Observer*). Clearly, the use of the ‘jihadi bride’ frame hopes to deter from increasing chances of citizenship rules changes. It also highlights the gendered and racialised application which would ensue from such a model: “it’s not enough to tell people they need not worry as long as they obey the law. It still makes them unequal to other citizens” (*The Sunday Times*).

For *the Sunday Telegraph*, conferring the modalities of citizenship to the State seem to be the way ahead. In this model, whether first-conceived as a right from birth, through descentance or ceremonial naturalisation, citizenship should not stand anymore as a right, but a privilege to a membership endowed by the State. There, despite possible demonstrations of genuine intentions, citizenship ought to be sustained by positive action, since the opposite makes ground for revocation. Here, the ‘jihadi bride’ frame is met with fright, suspicion and a need to protect oneself against such a monster. Such a vision further reinforces a two-tier citizenship system where immigrants are more targeted, and which assent ‘state discretion’. For *the Sunday Telegraph*, such a vision is endorsed because the protection of the community should prime: “Britain cheered when Sajid Javid (...) rescinded Begum’s British citizenship” (*the Sunday Telegraph*). For *the Sunday Times*, it asserted most Britons opposed the idea of Shamima Begum returning: “to judge by the response to our poll on whether teenagers who left Britain to join Isis should be allowed to return, Sajid Javid was right to take a hard line against Shamima Begum. A whopping 85% of you said “No”” (*The Sunday Times*). Under the advanced populist argument, such a claim urges the State to move closer and align with popular beliefs and public opinion as judged to be the ‘right’ decision. The hawkish position taken here vis-à-vis universal liberal democratic values seem to place individualistic and more populist decision-making on a pedestal: “our courts have a long history of overturning deportation orders, often in plain defiance of the statutes and always from the same political direction”, “public opinion might not be too fussed about legal niceties”, “in any case, what are we to do

with those who, unlike Begum, have only British nationality, and whom we are not allowed, under various international codes, to render stateless?" (*The Sunday Telegraph*). Recognisably, the 'ISIS Bride' frame has also served to promote a gendered and racialised view of citizenship. On the one hand, Muslim women are seen as risky or deceiving agents in their husbands' pockets or within the presumed 'ideology' they follow. On the other hand, it depicts a British girl from immigrant descent as 'obviously' entitled and unscrupulous in her demands. Furthermore, it denounces how Begum is being applauded as a celebrity by a part of the United Kingdom defending this behaviour, a part of the country whose religion is Islam. Indeed, the mention of Begum's lawyer aims to resonate with clear Islamophobic and xenophobic comments: Shamima Begum's family has hired one of the UK's top human rights lawyers whose clients included hate preacher Abu Qatada" (*The Sunday Telegraph*). Since Begum could hire a top 'fancy' lawyer, which has already defended 'similar undesirable individuals', it intends to imagine citizenship as conditional and easily removable for populations which are set to be mischievous and take advantage of our care.

France's eternal quest for 'republican universalism' at a crossroad:

France's tradition over citizenship has long been envisioned as a community rallied around 'la République- the French Republic'. Here, individuals hold a 'special' and genuine link to the State and vice-versa. This relationship singularly defined as 'republican universalism' imposes on the individual to ascribe itself to guiding principles and values, while the State is to ensure the liberties and equal rights of all. Citizenship through membership to a political community has defined France's approach to denationalisation debates and the (potential) repatriation of ISIS female members. Indeed, as constantly renegotiated, citizenship is framed as participation within a community of individuals with genuine intentions and who, under specific criteria, are rendered subjects to the French State's awarding of protection and duty of care. Ultimately, it is interesting to observe how the breakdown of the social pact sustained between an individual and the State does not allow for a rupture between the two parties, say the stripping of citizenship. For *le Nouvel Observateur* and *le Point*, two newspapers on the left and centre-right of the French political landscape, the "jihadi bride" frame, purporting to depict ISIS female members, conceptualises citizenship as a 'special' relationship between the individual and the State. For *le Nouvel Observateur*, citizenship is based on a 'genuine link' model. This means, despite failing to honour and defend the values of republican universalism, an honest redemption and an unfailing accountability allows for

the State to branch out and maintain citizenship. For *le Point*, a more hawkish position is presented. The ‘jihadi bride’ frame highlights the ‘ascriptive community’ model, that is where the State’s vested interests are predominant and its decision-making trumps any concerns over genuineness. Finally, on the flipside, right-wing press such as *Valeurs Actuelles* contend a divergent version of citizenship through its interpretation of the ‘femmes de djihadistes- jihadi wife’ frame. Here, a system conceived around ‘State discretion’ is imagined along clear gendered, racial and religiously-discriminatory stances. For Émilie König, *Valeurs Actuelles* frames her citizenship as dissolved by the French State as she failed to hold ‘her end of the stick’, that is defending the universality of French morals. Adding on to the latest point, it is worth pointing out the underlying gendered discrimination and the overwhelming Islamophobia which transcends the media frame within the French context.

a) Émilie König versus the French State: a Responsible and Apologetic Individual?

First and foremost, it is important to underline that in the French context, little explicit references to Émilie König as a “femmes de djihadistes- jihadi bride” are made. Nevertheless, throughout the articles examined, the main components ‘making up’ the frame were picked up through various terms: “‘combattante’ de DAESH- ISIS ‘fighter’”; ‘djihadistes- ‘female jihadi’” or “‘égérie de DAESH- ISIS poster child” (*le Nouvel Obs; le Point; Valeurs Actuelles*). Direct references to the ‘jihadi bride’ frame were recorded most in *Valeurs Actuelles* where Émilie König is predominantly imagined as a monstrous woman, a senseless wife and a corrupt mother. Through these representations, the right-wing newspaper magazine conceptualises Mrs König as clearly deprived of any vested interests on concerns of her citizenship. Here, the ‘ISIS bride’ frame upholds the lack of genuineness and the deceitfulness of the jihadi female member as entitled and suspicious: “some ‘errors’ whose seriousness she relativizes”, “at least not forget too quickly her active contribution to ISIS’ propaganda”, “the Breton, who has a short-term memory, has her eyes focused on the future” (*Valeurs Actuelles*). Additionally, the common use of the conditional tense which usually introduces a hypothesis or marking an uncertainty, a sense of suspicion: “she would see herself”, “she believes she would deserve to come back to France”, “she would intend to cooperate with the French judiciary” (*Valeurs Actuelles*). Lastly, journalists’ identify the ‘jihadi bride’ to usurp the French State: “sous nos latitudes- from our leniency” or “se garder de toute naïveté à leur endroit- to keep oneself from any kind of naivety on their behalf” (*Valeurs Actuelles*). In that sense, *Valeurs Actuelles* calls on France to strengthen its hold on citizenship against undesirable elements like Émilie König. Furthermore, her depiction as an unstable monster strengthens the

case for the State to not maintain a special link with such citizens, as well as take the privileges which are bestowed upon an individual away from such people. The use of superlatives to describe her terrible action is repeated: “the first of French woman to leave for Syria”, “the most terrible of French jihadi female members”, “the most effective ISIS recruiter” (*Valeurs Actuelles*). Several times, it is mentioned of her treacherous and monstrous actions: “she urged supporters of the organisation to attack French government institutions as well as the wives of French soldiers”, “she trained as to handle a shotgun and (...) became a powerful and influential recruiter, inciting her web recruits to commit attacks” (*Valeurs Actuelles*). Her presence on the most wanted list of ‘foreign ISIS fighters’ targets of the United States is also significantly repeated as a weighted form of acceptance of her dangerousness and of her incompatibility with French citizenship.

Now, if the right-wing political media landscape frames ISIS female fighters’ citizenship as nonspecific and removable, only disclosed by the State’s judgement, *le Nouvel Observateur* and *le Point* perceive citizenship of ‘ISIS brides’ as operating under a ‘special’ relationship. That means, the State and the individual find themselves tied to one another by agreed upon rules. Here, renegotiation of such a bond, by any party, is difficult. Both news sources frame Émilie König in similar fashion. Namely, König is an ISIS member who should be held accountable, who has allegedly committed callous actions and, who is perceived as a clear threat and danger. Still, even if depicted as a criminal, at no given moment do these news magazines frame König as unworthy or undeserving of possessing French citizenship. Further, the sense of change, repentance and forgiveness which stands out allows for the conceptualisation of a direct and personal relation between an individual and the State. In *le Nouvel Observateur* and *le Point*, both frame the “jihadi bride’s” monstrosity and madness through three elements. First, Émilie König is depicted as a responsible jihadist, who played a key role within the terrorist organisation she adhered to: “(she) played a key role as a propagandist and recruiter (for ISIS)”, “one of the most famous French jihadist, is accused of recruiting for ISIS”, “she was seen in various propaganda clips posted on social media advocating for an armed jihad” (*le Point*); “she appeared in ISIS’ propaganda clips, (...) in which she posed with a sawed-off shotgun, as if practising to shoot”; “from Syria, Émilie König openly advocated for (armed) terrorism, notably through videos showcasing her handling of weapons” (*le Nouvel Observateur*). Second, Émilie König is viewed as a murderer and repulsive woman: “intelligence intercepted her recurring phone calls to attack French institutions or to go after the wives of French soldiers”, “she regularly phoned her contacts in

France, calling them on to ‘commit violent acts against given targets on French soil’ (*le Nouvel Observateur*); “(she made) incessant phone calls advocating for attacks against French institutions or going after the wives of French soldiers” (*le Point*). Third, her unique and adulating monstrosity also participates in the ‘ISIS bride’ frame: “placed on the United Nations’ blacklist”, “according to her page on the UN Security Council’s website”, “Émilie König, figurehead of the French jihadi movement” (*le Nouvel Observateur*); “(she was) added by the United States of America on their most wanted terrorists list”, “as a pioneer, the young woman left for Syria in 2012” (*le Point*).

Émilie König’s monstrosity is thus similarly framed across *Le Point* and *Le Nouvel Observateur*. Nonetheless, her relation to the State is viewed as ‘special’ because she clearly displays signs of her changed behaviour and her remorsefulness. These advanced qualities allow for the State to (re-)establish a link to the individual which claims to possess French citizenship. In the case of *le Nouvel Observateur*, that ‘special’ relationship is framed as a ‘genuine link’, alluding to the model advanced by Paskalev and Bauböck. Indeed, left-wing political media argues that demonstration of genuine connections and belonging to the French community cannot be refused to a citizen which desires membership and protection. Across the articles examined, mentions of König’s changed behaviour is apparent, notably through her novel calling as an “ex-jihadi bride”, “ex-posted child of ISIS”, “the former French jihadi” (*le Nouvel Observateur*). Further, in interviews she has claimed: “I want to come back to France. I want to make up for my mistakes”, “of course I regret, because it has ruined all my life” (*le Nouvel Observateur*). Her desire for forgiveness is also accompanied by an unending sense of accountability which reinforces her changed behaviour and her willingness to abide by the principles French citizenship imposes: “she intends to cooperate fully with the French justice system”, “she regrets the comments she made and assured she wanted to pay her debt to France”, “she wants to come back and apologise, to her family, her friends, her country” (*le Nouvel Observateur*). Now, in the case of *le Point*, Émilie König’s repentance and her changed attitude also showcases the ‘ISIS bride’s’ citizenship as a ‘special’ one. Still, overall, the authority holding a judgement on König’s genuine intentions remains in the hands of the State. Plus, the legal aspect of König’s return due to her citizenship relates more to an ascriptive community where the State, considering individuals not through genuineness but under a list of fixed criteria, envisions and decides of the terms on which the individual’s citizenship operates. In this case, France’s legal obligations to return König, because of her French passport and not her genuine intentions, is predominant. Ultimately, France is delivering its ‘part of the

stick’, that is legal prosecution against unruly citizen. Two of the five articles analysed concentrate greatly on the legal obligation of France to return König: “several women have expressed their wish to return to France, even if it means being prosecuted and imprisoned”, “France has jurisdiction, because they are French nationals, but also because the offence against them, criminal terrorist association, began on the territory” (*le Point*).

b) Émilie König: Redemption through ‘French Couture’ and ‘French kids’?

On another point, Émilie König’s citizenship is thus framed by mainstream politics, that is *le Nouvel Observateur* and *le Point*, as the redemption of a monstrous and risky individual who has signalled her ‘genuine’ intentions to participate in her community. Whether or not she is believed does not take away of the special relationship that she sustains with the State which, as such, owes rights and protections to its citizens. Now, it is important to highlight two factors attached to the ‘ISIS Bride’ media frame which stand out in order to influence König’s perception. On the one hand, *le Nouvel Observateur*’s attention and obsession with König’s clothing can relate to her attachment to the principles and values of a French State where gendered, racialised and religiously-discriminatory stances are pervasive. It also metaphorically demonstrates her ‘departure’ and ‘break-off’ from ISIS and its radical Islamic ideology, incompatible with French values. Indeed, she was first described as “(having) relinquished her catholic Breton and French identity for another identity”, one “under a Black niqab”, “(described as) her second skin” (*le Nouvel Observateur*). Now, Émilie König’s citizenship seems framed along her new appearance, discussed at length across seven paragraphs examined, directly linking her to back to her former-self at home: “she swapped her full veil for leather leggings, and she does not longer cover her hair, to ‘get used’ to life in France again after her years with the Islamic State”, “now, I dress up, first of all for myself, and in a way that allows me to get used to coming back (to France)”, “the young woman, black cap screwed on her braided hair where bleached locks appear, dressed in a sweatshirt over a faux leather pair of leggings”, “I want to go back to a professional life, and my professional life that I had before, I could not wear the headscarf” (*le Nouvel Observateur*).

On the other hand, *le Nouvel Observateur* symbolises König’s affection to France through her motherhood, through her (French) children which she hopes to be reunited with and take care of. As part of the ‘jihadi bride’ frame, König is envisioned as a young careless women, as a sombre housewife, and as a corrupt mother: “she tried, in vain, to retrieve them and bring them (her children) with her”, “in another video recording (...) she sent propaganda messages

to her children: (...) ‘don’t forget that you are Muslims. Jihad will not stop as long as there are enemies to fight’ (*le Nouvel Observateur*). Over time though, the frame evolves into building up the image of a failed mother, one separated from her children, which attempts tirelessly to reunite herself with them: “Since they left, there hasn’t been a day when I don’t think about them”, “I hope one day to be able to see my children again, the six of us will be around a table”, “there is a part of me which is dead without my children”, “I (Mrs König) want to see my children again” (*le Nouvel Observateur*). Even if the prime reason for her genuine link to return to France is her children, it is compelling to note then importance of motherhood as a justification for her citizenship also vis-à-vis the State: “(Émilie König) is the mother of three French children. Everything needs to be put in place to facilitate their return, according to France’s international engagements” (*le Nouvel Observateur*).

For *le Point*, minor mentions help identify Émilie König as a failed mother seeking redemption and a ‘deradicalized’ woman through clothing, although suspicion (i.e. language) or omission (i.e. her children) taint the ‘assimilating’ or ‘accountable’ image: ““Émilie König (appeared) in a first video speaking in Arabic, facing the camera and without a veil on her head”, “we cannot leave French minors wither away in Kurdish or Iraqi prisons” (*le Point*). In this context, these factors cannot be considered overarching ‘framing agents’, helping to conceptualise ISIS female fighters’ citizenship. Actually, following the ‘ascriptive community’ model it recognises, *le Point* conveys König’s attachment to France to be purely legal and judicial because of her failings as a French citizen, as well as reciprocally since it represents the State’s vested authority over its citizens. As such, *le Point* frames König as a fugitive returning home: “requested by France since 2015 as part of an investigation (...), she said she was at the disposal of the French justice”, “all women must be repatriated, even if it means that they are arrested on arrival”, “her lawyer has asked for her repatriation to France, because (...) the French authorities have the obligation to prosecute her” (*le Point*). Ultimately, whether coming home with genuine intentions or not, König’s citizenship remains framed around a monstrous woman which, due to her unequivocal belonging to France, befalls under the State’s responsibility. For *Valeurs Actuelles*, the right-wing political news magazine, the ‘ISIS bride’ frame focused on König’s failed and corrupt motherhood, leveraging her children to sustain her citizenship, as well as resume her monstrous actions. Indeed, the ‘jihadi bride’ frame views the ISIS female member as the housewife, the birthing mother, the educator and the bearer of ISIS’ social reproduction: “if we still have decades of radicalisation ahead of us, it is more due to women than men, because they are there to ensure the ideological perennity

of the group”, “a continuity of the caliphal structure over frustration and colonisation by the belly” (*Valeurs Actuelles*). Moreover, it explicitly calls out König’s alleged scheme dubbed as “the right to ‘family reunification’ in French Islamic-terrorist style”: “the ‘family’ reality of jihadism in fact places the rule of law in a grotesque position of obligation, while mothers, even if they are ‘jihadi wombs’, have an easy time abusing their problematic ‘right’ of return, via the unavoidable right of their children. It is through this means that Émilie König (...) has been trying for months to return to France on behalf of her children” (*Valeurs Actuelles*). In this context, the use of the ‘jihadi bride’ frame continuously allows to depict König as a loyal ISIS pawn. For *Valeurs Actuelles*, this undeniable allegiance, incompatible with French citizenship, should allow for the State to strip her from the privileges she still possesses, albeit in a discrete and generic manner since “(she) self-excluded herself from the national community” (*Valeurs Actuelles*). Overall, *Le Nouvel Observateur* testifies of ISIS female fighters’ attachment to their home country: “we want to go home, says another. Vive la France!, adds a third”. Still, using the same occurrence, *Valeurs Actuelles* positions these women as outside the community to whom they belonged. It turned this event into a blasphemous episode, assuming French people would and could not self-identify to: “to convince, another inmate even praised the country she had threatened: Vive la France! She shouted”.

c) Émilie König: ‘groomed daughter of the Republic’ or ‘real enemy of the Republic’

A final theme to unpack is over how the ‘ISIS bride’ frame discusses public perception of Émilie König’s situation. For *le Nouvel Observateur* and *le Point*, König is framed through her troubled upbringing, her subsequent ‘life errors’ and her relatable family background. All these explanations draw an apologetic picture of an unlucky woman who made the wrong choices, was blinded by love and who could have been any of us to some extent. Indeed, both newspaper delve into König’s life: “(she) is the last of four siblings. The young girl, who hardly knew her father, a gendarme, followed a standard education and then obtained a diploma to become a saleswoman on a work-study basis” (*le Nouvel Observateur*), “the daughter of a gendarme” (*le Point*). Through these remarks, journalists attempt to answer the impossible question of why such a woman would join ISIS: her father’s absence, that is the lack of a male presence, is perceived as a justification. Also, it presents the story of an ‘ordinary’ French girl who could be everyone and anyone at the same time. Further, “she converted at the end of her teenage years, and married a French man of Algerian origin, sentenced to five years in prison for drug trafficking”, “her radicalisation began in the 2010s, alongside her first partner.

Convicted of drug trafficking, the latter is still in prison.”, ‘this Breton young woman who converted to Islam’ (*le Nouvel Observateur*), “she is said to have been radicalised by her first husband, an Algerian charged with drug trafficking” (*le Point*). It is interesting to note here how the ‘jihadi bride’ frame allows for König to be portrayed as a corrupted young (catholic and white) girl. Worse, she was corrupted by a ‘French of Algerian descent’ or simply ‘Algerian’ man. This overtly intends to specify his racial background and push a share of the blame on him. In this context, the ‘jihadi bride’ becomes not a foreign monstrous object. On the contrary, it becomes any little girl who was groomed and that the French State failed to protect. In the end, the life she was ‘forced’ to follow, showcasing her rocky housewife and mother situation, attempts to soften the community, reinforce the idea of a genuine mistake and gather public opinion around the ‘forced jihadi bride’ in need of saving: “twice remarried, twice widowed, she gave birth to three other children”, “mother of five children- two born in Syria, another in Iraq- and twice widowed of IS fighters”, ‘she married a French jihadist, who has since died, and with whom she has another son’ (*le Nouvel Observateur, le Point*). A small addition to make is the importance across *le Point* not to have König solely come back because of her failed education and social reproduction at home. For journalists at *le Point*, it is also because of the State’s interests of prosecuting the ‘ISIS bride’, as well as to protect the whole community: “a transfer to France represents a challenge for national security”, “Mr Vinay fears an arbitrary policy that would select jihadists who can be repatriated according to subjective criteria, such as their importance or their level of repentance”, “for the lawyers, everyone loses in the current situation: women and children because they continue to be immersed in a potentially dangerous fundamentalist atmosphere in the camps, and France because it has no certainty that potentially dangerous detainees will not be released” (*le Point*).

Ultimately, *Valeurs Actuelles* takes an opposing view about Émilie König’s potential return to society. Its defence of a model of citizenship where withdrawal of citizenship is obtained through a designated procedure under the State’s own discretion is motivated by a desire to protect the wider community. *Valeurs Actuelles* employs the ‘jihadi bride’ frame to portray these women as “internal enemies” who would solely be allowed to return due to liberal democracies’ failure to protect its ‘own’ citizens. Additionally, it decries the naivety of liberals and progressives, defending the repatriation of these women, behind alleged burdensome international legal obligations. It denounces the complacency of the State against part of the population ‘taking advantage’ of the rule of law and the duty the State is obliged to maintain: “some beautiful souls are now saying that the young jihadist ‘deserves’ to return to France on

the pretext her children are French”, “these jihadists who (...) have burnt their French passports and continue to hate the West do not seem repenting. They will be able to continue their verbal, missionary or military jihad against France and the Western unbelievers”, “(ISIS female members) will continue to benefit from family allowances, minimum incomes, social and legal rights, reimbursed care, and costly reintegration programs. And they will of course benefit from the help of lawyers, complacent intellectuals and even laxist judges who consider society to be guilty while terrorists are ‘victims of exclusion’.” (*Valeurs Actuelles*). Over these lines, a possible comparison of these accusations from the right-wing press against foreigners and French citizens from a minority-background would potentially lead to similar conclusions. In that case, the ‘jihadi bride’ frame serves its purpose of criminalising ISIS female members. By extension, it also englobes criminalising other groups of citizens adjacent to these women, namely any woman who isn’t white or Christian. These groups of individuals which are deemed disrespectful and incompatible with France’s republican universalism, are believed to work on its demise: “‘cultural diversity’ and the ruthless fight against ‘Islamophobia’ will be praised; and we will pretend to prevent radicalisation because in any case, no one dares to question the sources of said radicalisation contained in part in the very theocratic warrior doctrine of the Sharia, taught in many mosques in the West”. Ultimately, by invoking having popular opinion in favour of their stances, *Valeurs Actuelles* claims holding the will of the people: “the government, like a majority of French people, fear above all the ‘returnees will commit attacks on our soil”, “89% of those questioned say they are worried about the return of jihadists to France”. As such, in their view, the question of enshrining citizenship deprivation relates to fighting against ‘traitors to the fatherland’ and defending its longstanding republican universalism: “even if it shocks those who advocate for ‘penal colony’, denationalisation (...) is not inadmissible”, “in France, where citizenship stripping has become taboo” (*Valeurs Actuelles*).

Discussion and Conclusion

Under Paskalev and Bauböck's citizenship conceptualisation, this thesis has found that the United Kingdom's political media landscape, as well as France's, are deeply polarised on the matter of identifying ISIS female members as citizens or not. Through the use of the predominant 'jihadi bride' frame, different learnings could be brought out on the reporting done of these women and their subsequent perceptions as citizens. Ultimately, it seems the concept of citizenship is forcibly being politicised to engage in specific political agendas.

Citizenship as the new battleground for populist nationalists

Across the French and British media landscape, similarities as well as differences can clearly be drawn. First, both media landscapes possess a right-wing press landscape which align themselves on their advocacy for deep reform of the concept of citizenship. *The Sunday Telegraph*, *the Sunday Times* and *Valeurs Actuelles* all present membership to a community under the prism of exclusive State authority. All these news magazines advocate for a reversal of the 'democratisation' of citizenship towards an original exclusive and homogenous group of individuals with ancestral ties to the nation. Fraught with disdain for international conventions and human rights principles, the 'jihadi bride' frame captures an expanding populist and nationalist opinion. Indeed, the meanings attached to the 'jihadi bride' frame reinforce a divide, an 'us' versus 'them' dichotomy. That is, a loyalist camp to the nation's principles against the usurpers and 'enemies from within'. For the United Kingdom, based on a desire to sustain a secured environment. For France, based on the necessity to allow an emancipated, abiding and universal political community. In all, both marginalise minority groups perceived as attempting to maximise the nation's 'generosity' and impose their understanding of 'making society'. In that sense, the 'jihadi bride' frame does not only target ISIS female members attempting to return home. They intend to disproportionately affect minority-background individuals, whether it be religious (Muslims) or national (dual-citizens). Citizenship thus is not to be a right, but a privilege, conditional on good conduct and the popular support. Moreover, right-wing press outlets denounce, what they perceive as, the incredulity of the State and of the progressive politics for undermining the State's ability to 'fight terror through all its means'. In their view, parts of the State apparatus- whether public services, the judiciary or academia- have been complicit in upholding citizenship rights which go against the 'popular fervour'. This critique goes hand-in-hand with the vision of a more individualistic version of citizenship,

with a shrunken and more authoritarian State, where decisions (such as revocation) are swiftly and discreetly made.

On a second note, the view shared by the centre-right news magazine *The Sunday Times* ought to interrogate on the ‘populist turn’ which has affected citizenship debates recently. Although it has advocated for all the aforementioned points, a substantial number of articles from *the Sunday Time* nuanced or denounced some of their colleagues’ arguments. Indeed, if the belief of an increasing need for State authority is undoubted, some journalists have refuted and remained hawkish amidst increasing populist and nationalist rhetoric. In these articles, journalists condemn any opposition to international norms, principles and pacts the United Kingdom is signatory thereof. Additionally, it speaks out against human rights violations which may occur from such course of action. Lastly, it also denounces the cowardice of the State to defect from its moral responsibility and duties while claiming to want to take more authority and responsibility. Clearly, *the Sunday Times*’ difficulty in taking a clear stance is testament of the polarisation over the conceptualisation and boundary-making process of citizenship.

A third point to consider is the modulization of citizenship operated by *the Observer* in the United Kingdom and *le Point* in France. If both are not from similar political-leanings, they adjoin their vision of citizenship to an ‘ascriptive’ community system. As already mentioned by some of the journalists from *the Sunday Times*, English leftists and French liberals seem to defend the need for more of the State’s vested interests to be recognised though rules ought to be specified and rarely modified. It is worth pointing out, France’s long-standing tradition of citizenship as membership to a political community forces French liberals to identify the citizen as maintaining a ‘special’ relation with the State. A final remark which stands out is the misalignment of France’s and the United Kingdom’s left-wing political media landscape. Indeed, *Le Nouvel Observateur* stands out. It advocates for framing citizenship as possession of a ‘genuine link’ between the individual and the State, that is where the individual’s vested interests take central form in the negotiation of citizenship. Although measuring the genuineness of citizens towards their respective State(s) remains a clear criticism from right-wing press outlets, such a conceptualisation allows for more inclusive and far-reaching visions of citizenship. This difference between left-wing press outlets in the United Kingdom and France reinforce the view of a disparate and inconsequential ‘response’ or ‘riposte’ to the newly-advanced vision of citizenship pushed by a unified right-wing political media landscape.

So ‘jihadi bride’ or ‘failed citizen’?: the pervasiveness of Islamophobia

An additional learning to highlight is that the current renegotiation of the meanings of citizenship, in both France and the United Kingdom, have disproportionately affected particular groups of individuals in relation to the ‘jihadi bride’ frame. Indeed, gendered, racialised and religiously-discriminative postulations permeating the ‘jihadi bride’ frame affect the citizenship rights of women. Specifically targeted are women of colour, women from an immigrant background, or Muslim women. In the United Kingdom, gendered and racialised notions of citizenship over the ‘jihadi bride’ frame blur and complexify the boundaries of citizenship. There, these women are characterised by their suspiciousness, passivity and idiocy. On that basis, the inferiority and submissiveness attributed to the ‘jihadi bride’ frame interrogates on these women’s allegiance to the United Kingdom and contribution to society.

Furthermore, if the United Kingdom’s exclusionary assumptions seem further reaching than France’s, the French political media landscape seems rooted in Islamophobia. Indeed, France’s universal republican tradition remains attached to the concept of *laïcité*, that is, a freedom of religion and its inexistence when identified as a citizen. In other words, in the eyes of the French Republic, a citizen is as such regardless of religion and should not invoke its religion in public settings. On that logic, for the French media, the use of ‘jihadi bride’ frame does not carry ‘at face value’ an identifiable discrimination affecting women from similar backgrounds. Actually, it is the underlying notion of ‘failed citizen’ which transpires indirectly when referring to the ‘jihadi bride’ frame which does so. This notion of ‘failed citizen’ arises through the particular vision of what a women representing French citizenship should look like. In that illustration, a fully-fledged citizen would be considered independent, modern and without religious signs (owing to the principle of *laïcité*). Owing to their differences, the ‘jihadi bride’ turns ‘failed citizen’ which, in turn, illustrates a more pervasive gendered and racialised viewpoint of citizenship in France: first, the ‘jihadi bride’ is deemed dependent on her husband. Second, the ‘jihadi bride’ is the opposite of modernity since she has chosen to follow a ‘backward’ and ‘oriental’ ideology. Third, the ‘jihadi bride’ who wears the Islamic veil cannot be a French citizen since it does not accept the wear of ‘ostentatious’ religious elements. Altogether, the assumption and reinforced view that a French Muslim veiled woman is forcibly trapped in a radical ideology generalises and criminalises Muslim women in France. In addition to that, if French left-wing press would be considered more progressive on questions of diversity and inclusion, its use of the ‘jihadi bride’ frame proves paradoxical. In their view,

Émilie König's repentance, although translating of her genuine intention of membership to France, can only be recognised and confirmed by König's change of attire.

Citizenship through 'reversed jus sanguinis'

Lastly, a similarity which can be drawn from the two respective national political media landscapes is their use of the gendered perception of 'jihadi brides' as '*Monsters, Mothers, and Whores*'. Specifically, across both countries justifications for and critiques of citizenship deprivation befall systematically on these women's portrayal as mothers. Indeed, Shamima Begum and Émilie König's children enabled them to claim citizenship. In the case of Shamima Begum, the death of her children did not play in her favour since her lack of affiliation/descent gave her no 'valid and justifiable' reason to seek a return to the United Kingdom. For Émilie König, returning for her children is addressed by some journalists as her prime concern and the decisive factor in favour of her return and her understanding as a French citizen. Even for the right-wing French media's reporting, Émilie König's children are justified as her only link to France. Clearly, the hypothesis advanced by scholars that mothers hold a lower threshold for citizenship due to their social reproductive capacity and their identification as 'mothers of the nation' seem to be confirmed. Still, this thesis' analysis goes further and contends that it does not seem to solely be motherhood *per se* which allows for the negotiation of these individuals' citizenship. In fact, it is these mothers 'reversed *jus sanguinis*' which allows them to maintain their citizenship. As an inalienable bond, '*jus sanguinis*' is the prime and most ancient moderator of citizenship. As such, States remain reticent to go against it. Intersecting with gendered notions of motherhood, the maintenance of these women's citizenship remains attributed in their capacity to be a universal symbol of human life, which all derive from.

Taking into account the findings of the completed analysis, this thesis has observed the boundary-making process of citizenship throughout the British and French media landscape amidst rising debates over the question of citizenship stripping. Specifically, the meanings derived from the 'jihadi bride' media frame were analysed to unpack the gendered and racialised elements which force the understanding of citizenship. Using the conceptualisation of citizenship advanced by Paskalev and Bauböck, this thesis has found that a general trend of viewing citizenship as 'generic' and advised 'under State discretion' has gained traction. That is, citizenship has become increasingly understood as unidirectional. The State is pushed to

hold moral and legal authority over the concept. Also, it has become singularly individualistic since the treatment of such a relation is no longer considered universally applied to all citizens. Clearly, the media framing of ISIS female fighters testify of an evolving, perhaps tightening position over the use and justification of citizenship deprivation in liberal democracies. In France and the United Kingdom, a so-called ‘citizenship backsliding’ may be envisioned as in action amidst rising national populist stances which attempt in excluding certain groups from citizenship. Now, it is worth pointing out that France attempts to maintain a vision of citizenship based more on ‘shared responsibility’ between an individual and the State. That way, it theoretically upholds a universal application to generate a special and unshakable bond with each citizen. France remains then more hawkish than the United Kingdom on the question of exclusion from society through citizenship stripping. Indeed, the French media landscape still believes in the universal promise of republican ideals for all, where the State and the individual share a ‘special’ relationship under a higher institution under which each citizen ascribes to. In that sense, attachment to such a model is motivated against incoming reforms such as what occurred in the United Kingdom. There, the perception of citizenship stripping has been more pervasive due to the United Kingdom’s acceptance that security for all trumps responsibility of an individual. In all, from the analysis made over the French and British media landscape, it is projected that the United Kingdom conceptualises its citizenship as membership to a monolithic bloc. There, problematic individuals who are judged as risky to the community are cast away. For France, citizenship is assumed to be formed around membership to a coalition of like-minded individuals. There, problematic individuals who are judged as risky are judged risky to the ideals of the community (not the others). As such, they are sentenced to pay the price in front of the community. Put simply, the United Kingdom would favour the proverb “actions speak louder than words”. France seem to prefer “words speak clearer than actions”.

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