

The Invisible Surveillance

An analysis on the western newspaper discourse on the advance technological surveillance state, on the case of China's Social Credit System

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04.07.2018

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Abstract

This study aims to answer the following research question: “*How is the discourse towards the technological advanced surveillance state of China illustrated in the media of the European Union and the United States?*” This research is approached by evaluating the western newspaper discourse on China’s *Social Credit System*, on the theoretical foundation of the concepts of surveillance states, advanced technological surveillance and social sorting systems. The findings show that the western discourse considered the effects of the *Social Credit System* in China and comparable digital structures to be violating, anti-democratic and scrutinizing and thereby endangering human dignity, human rights, as well as the concept of citizenship. These findings are providing crucial new insights on the western perception on advanced surveillance technology in authoritarian regimes. Throughout this study the development of such technology in western democratic countries is also considered, to acknowledge developmental similarities and to provide a basis for western governments to recognize the need to evolve their policies in order to protect citizens’ democratic rights in the digital world, as well as in the real world

List of abbreviations

SCS *Social Credit System*

U.S. United States

CCP China's Communist Party

CDU Christlich-Demokratische Union, a German political party

1. Introduction

“The tyranny of algorithms is part of our lives: soon they could rate everything we do“
(*The Guardian*, 2018)

Ever since the Internet, new digital technologies are constantly invented to promote high speed Internet and “big data” gathering, with algorithms. China for example, counts the most Internet users in the world, (Liang & Lu, 2010) aggregating a respective amount of digital data.

In 2014, China’s government publicly introduced the *Social Credit System* (SCS), a blueprint of a new advanced digital technology tool of surveillance, aimed at being fully implemented by 2020. The SCS is claimed to have the purpose to uphold China’s “harmonious socialist society” (Kshetri, p.302, 2016) and to “strengthen social management [...] by recording the entire digital presence of individual citizens” (Zeng, p.1453, 2016). It is said to categorize Chinese citizens according to their behavior, opinions (especially political opinions), and compliance with China’s core values. To surveil such behavior, individual data are aspirated from social media, personal banking, credit information and other digital sources, to generate their Social Credit Score. As Zeng (2016), states this practice is applied to “strengthen the CCP’s authoritarian rule by improving governance and upgrading state surveillance” (Zeng, p.1443, 2016). It seems like the CCP is gaining more power from this system by becoming “more capable of repressing civil rights” (Zeng, p.1446, 2016).

Scholars of surveillance studies often take a critical position on surveillance states and define them as “pervasive, penetrating and consequential, [...] in decision-making about the lives of aggregate populations and individual citizens” (Bell, Haggerty, & Lyon, p.2, 2012). Lyon (2015a), for example, defines surveillance as a threat to privacy, which is facilitated by social sorting, because of its categorization of individuals, resulting in different treatments of people and it enhances social inequality (Bell, Haggerty, & Lyon, 2012). These are not effects directly resulting from advanced development of surveillance techniques per se but are dependent on the way these technologies are implemented and are used by governments. Still according to Lyon (2015b), “despite two decades of growth in Surveillance Studies there seems to be little public understanding of surveillance as it is practiced today“ (Lyon, p.142, 2015b).

Therefore, this paper focuses on the western newspaper discourse on advanced surveillance technology, in regards to China’s SCS. The discourse will be analyzed to evaluate the democratic western perceptions’ of the Chinese *Social Credit System* in regard to

its impact on democratic core values. Therefore this study comprised firstly current social changes that are due to digital developments, which may affect world structures. Secondly, it evaluates how the democratic West perceives and is aware of how new surveillance technologies impact the power structure of authoritarian regimes on the example of China. Here the main focus is set on inherent problems, in regard to the effects on democratic values and the effects facilitated by social sorting systems inherent in the SCS, as scholars express attributes of increasing suppression and control of people, endangering their human dignity. Thirdly however, this study was conducted to evaluate how democratic states are increasingly invested in the use of new digital technologies to improve public governance (Zeng, 2016) because, as Richards (2013) puts it “democratically elected governments in the West have deepened their commitment to surveillance of the public as well” (Richards, p.1936, 2013). By investigating China’s implementation of the SCS through the lens of the western newspaper discourse, this study not only pioneers on a field barely researched thus far. But it aims to be an enlightening tool for the general public by providing insight on how governments and companies increasingly making use of such new surveillance techniques. As well as this research strives to deliver information that may be helpful for governmental approaches, in terms of policies on digital surveillance techniques and considering investments in equivalent technology. Therefore this study adds value to the digital surveillance technology topic to fulfill a scientific and social purpose to establish important knowledge on this crucial development.

Subsequently this paper is concerned with the main research questions: *“How is the discourse on the technological advanced surveillance state of China illustrated in the media of Europe and the United States?”* Hence, this question is divided into two sub-questions: *“How is the discourse on China’s Social Credit System illustrated in the U.S. and European media?”* and *“How is the Social Credit System assessed from a Western World point of view in the media?”*

These questions are asked from a democratic standpoint, as they observe the western perception upon advanced surveillance technologies in the authoritarian regime of China by conducting a western newspaper discourse analysis on China’s SCS. This case was selected to endorse the theoretical approach to answer the posted research question. Various scholars draft similar questions concerning ethical, democratic core values and human right issues when evaluating new advanced surveillance technologies. Especially since the Snowden disclosure, questions about privacy, civil liberties and human rights dominate the surveillance research scope (Lyon, 2015a).

The first sub-question aims to establish an understanding on the degree of tolerance and acceptance of the SCS development in the western world. Hence, the second sub-question emphasizes to shed light on opinions and conceptions of effects and changes acknowledged as curial from a western worldview when analyzing the western discourse.

1.1. Research Approach

To provide a transparent research process and to reach sufficient answers a structural approach to this study is needed. Therefore, the following first section will present the theory. It is mainly based upon theoretical approaches of surveillance and was chosen to build a basis of argumentation and to provide academic in-depth insight on the topic of surveillance and the construct of social sorting systems. Secondly, the method approach to answer the research question will be a discourse analysis on western newspapers, similar to the approaches used in the studies of Marciano (2008) and Joye (2010). After a close analysis on the articles' content, this will be linked to the theoretical background to build an argumentation that leads to a conclusion based on the discourse analysis of the western perception on advanced surveillance technology. In the conclusion the result of the analysis and the discussion will be presented and summarized with regard to its relevance on the social and scientific level.

2. Theory

The construct of surveillance states has changed rapidly over time. A change from manual surveillance to an invisible, algorithmic based process, relying on the collection of private data by various platforms and institutions from the ordinary citizen. The Internet and the digitalization of people's everyday life is the force of this change, regardless whether it concerns a democratic state or an authoritarian regime. However, structures of surveillance states and the new construct of social sorting systems, as a function of new digital surveillance and as a tool of strengthening surveillance, is very critically debated in the scholarly discourse in terms of democratic values, human rights and therefore in terms of the concepts of inequality and privacy issues. Hence, the scientific discourse will be illustrated in this section. This theoretical ground is used with the special focus on China's *Social Credit System*, stressing the increasingly occurring issues mentioned above, resulting from the implementation of such system.

2.1 The ambivalence of surveillance

Foremost it is necessary to define surveillance as such, in order to describe its implication for the surveillance state. The processes of surveillance are often described as ambivalent. Whereas surveillance in itself implies the process of collecting information of individuals: the intentions of governments behind the process of surveillance can fundamentally differ (Koskela, 2012). On the one hand their intention may be to generate security and protection for individuals, on the other hand the process of surveillance can be used with the intention to increase control and power (Koskela, 2012). Government's intention to control and wield power, however, is the predominant conception presented in scholarly literature. Michel Foucault as one of the main theorists in this field introduced the model of "power surveillance" (Weller, 2012). For him surveillance is an "panopt[ical] [form], a metaphor of society, as he sees it as camera society, reminiscent of Weber's "iron cage" [...] to depict what he termed the "formation of a disciplinary society" (Kroener & Neyland, p.144, 2012). David Lyon, too, negatively defines the surveillance structures of today: "surveillance is pervasive in every sector of social life [...] creat[ing] degrees of integration of surveillance systems, undreamed of, in the worst Orwellian nightmare" (Monahan, p.96, 2010). On the other side of the scientific discourse scholars discuss "more mundane motifs" (Lyon, p.144, 2015b), supporting surveillance development, speaking of efficiency and convenience in peoples' everyday lives as well as governmental activities (Lyon, 2015b).

However, in the general literature the process of surveillance in democratic states is described, as a “political necessity in terms, both of protection of citizens against threats, and also through pastoral care of citizens’ health and welfare” (Weller, p.59 2012). This implicates that surveillance improves governance’s efficiency by providing welfare necessities (Zeng, 2016). In comparison, in authoritarian states surveillance plays a “rather different role, although, superficially at least, with the protection and pastoral allusion” (Weller, p.59 2012) it is often discussed how non-democratic states have “zero tolerance” security (Botello, p.259, 2012) and abuse their power in terms of social control and scrutiny, to suppress individuals and to maintain the authoritarian ideology (Zeng, 2016). The issues surveillance generally implies are that it “creates knowledge, based on certain assumptions, categories and technical abilities” (Koskela, p.50, 2012) implicating subjects of inequality in treatment, perception and assessment of individuals, as often minority groups are targets of surveillance, carefully scrutinized by the majority (Koskela, 2012). Correspondingly, e.g. social inequality implications are adopted into the system of surveillance, with its extent of conduct, therefore situations are still characterized by biased evaluation, and thus surveillance is not a straightforward matter but rather a dependent relation of “personal qualities such as gender, sexuality, age, race, and color” (Koskela, p.51, 2012) determent by the majority. In this respect citizens have expressed concerns about the issues of surveillance but often accept its entitlement referred to welfare privileges and safety (Weller, 2012)

2.2. The power of digital surveillance

Surveillance today is constantly developing because of advanced digital processes, the establishment of the Internet and the development of technology. In contrast to the original surveillance tools, such as cameras, policing and face-to-face observation, the new surveillance process consist of the gathering of Big Data, algorithms and “dataveillance”¹ resulting in a process that is not limited to borders and specific spaces (Lyon, 2015a). It is more an invisible and automated process, included in experienced activities among others by the government (Marx, 2002). Under the concept of digital surveillance “the body is not simply seen, but is now an entity onto which all sorts of information are attached” (Koskela, p.52, 2012) influencing “mass monitoring of data in search of patterns of relationships” (Lyon, 2015a). Data is gathered from mobile phones, social media and other online platforms, in order to scan and track personal information (Weller, 2012). The establishment of Big Data

¹ „Data Surveillance (or Dataveillance) is the systematic use of personal data in the investigation or monitoring of the actions or communications of one or more persons“ (Clark, 2016)

may have positive impacts on governmental efficiency but it intensifies the issues of the emergence of the surveillance state as such too, no matter if in a democratic or authoritarian structure (Zeng, 2016). However, it is argued that especially in authoritarian regimes, which are often characterized to have a history of “zero tolerance” policies of security, here these new surveillance techniques support the old structure of authoritarian surveillance practices even more (Botello, 2012), a good example is China. According to Lyon (2015a), since people make use of the Internet, they are feeding datasets with personal information, which again determines how good a surveillance process of the government actually can be executed. This adds to the fact that “data will become less fragmented and more centralized, with much less held in non-digital form and will thus become more powerful” (Zeng, p.1459, 2016).

If one compares China and the Western hemispheres, this development of surveillance techniques shows various similarities. As described above, both polities are actively using new technologies and benefiting from the invisible development of the means of surveillance, though the purpose of surveillance is done with distinctive intentions. From this theoretical foundation, China as an authoritarian regime intentionally uses such structures of surveillance as a mean to keep its citizens in line with CCP values and ideologies. Whereas the democratic western states claim to assure safety and protection for their citizens if collecting data as means for digital surveillance. Nevertheless, it is important to acknowledge that, this perception of China in comparison to the Western World in terms of surveillance is a grey zone. In other words, to simply perceive China’s authoritarian regime as the only government using its citizens’ vulnerability for their own good, with no respect to their privacy rights, right to freedom of speech, or their human dignity, must be critically observed. For example, Lyon (2015a), argues that the Western intention of surveillance should not be taken as innocent. In Europe or in the U.S. surveillance techniques are used in nearly every aspect of everyday life too: from camera surveillance on the street, to Internet users necessity to accept “Cookies” to use certain online pages. “Britain [for example] is one of the most heavily surveilled countries in the world” (Richards, p.1938, 2013). Also incidence such as the “Snowden affair” show that the European or U.S. governments’ intentions should be critically discussed when it comes to the use of new invisible, advanced surveillance technologies. Crucial to notice here is, considering the democratic structures of states, they are operating with the risk to overstep boundaries when it comes to democratic values and citizens’ entitled rights. Hence, for western governments, using these technologies may have beneficial outcomes, as “governments have been eager to acquire the massive consumer and Internet-

activity databases that private businesses have compiled, for security and other purposes” (Richards, p.1937, 2013). Google, Facebook, Amazon, etc, these are all Western companies, who are of big interest for the governments as they own huge dataset with information about a significant number of citizens. For example, up to 1.317 billion people alone are active on Facebook (2014) (Gertz, 2015). Such companies in itself are often threats to democratic values; Facebook’s privacy regulations for example never had the intention to protect the user but are only there to benefit the company (Gertz, 2013). Such a development may imply that democratic governments “contribute to production of neoliberal subjects who approach the world through the eyes of consumers rather than those of citizen entitled to rights” (Monahan, p.100, 2010). Also it is questionable to what extent the democratic government can justify this collecting of private data, as it remains unclear whether or not their articulated intention to use this data for security and safety of citizens will be fulfilled at the end. These are just examples of resembles to China’s surveillance structures. These huge western data gathering companies are equal in their approach and structure to the Chinese companies: Alibaba, Weibo (Twitter), Baihe (Tinder), Didi Kuaidi (Uber) or other companies, are used by citizens of China and in their deductive form by the western citizens, as they make live easy, pleasurable and are therefore very convenient to any one. But any of these enterprises are gathering tonnes of private information every single day, saving them to huge data bases, selling them to other companies and building a net of capitalist gold valued information of citizens, wanted by governments, accordingly to generate security and protection for individuals (Koskela, 2012) or to support the power structure of authoritarian surveillance practices (Botello, 2012).

2.3. Social Sorting a repression technology

As mentioned before, China is implementing a *Social Credit System*, a form of social sorting. Generally social sorting implies a surveillance-based control (Monahan, 2010). Today a control based on advanced digital technology that “facilitated a crucial categorization dimension in addition to the already-existing use of statistical tools in administrative surveillance” (Haggerty, Lyon, & Ball, p.5, 2012). Social sorting depends on digital data and technology, constructing differentiations within society (Monahan, 2008). Scholars in the scientific discourse argue that such a concept is very “antidemocratic” because of the way they “sort population unequally, produce conditions and identities of marginality, implying upon the life chances of marginalized populations and normalize and fortify neoliberal world orders” (Haggerty, Lyon & Ball, p.3, 2012). Furthermore, as it is a new construct of surveillance, the process of social sorting in itself is invisible for those being categorized, as a

result the process as such is not actively acknowledged (Monahan, 2008). It uses personal information without peoples' direct consent (Marx, 2002) normalizing the act of categorization (Monahan, 2008) because the level of awareness for this process seems to be limited. Social sorting emphasizes the authoritarian construct, as it works as a "repression technology" and strengthens authoritarian structures (Zeng, 2016). It exercises authority in terms of control and repression, as people are ranked according to their categorical status implying privileges or punishment accordingly, disciplining citizens to enforce desired behavior (Monahan, 2008). Importantly, as based on digital data, this discipline of power is no longer limited to the "real world" but as such connected with the digital world and therefore can "hold individuals in the real world to account for their behavior in the virtual world" (Zeng, p.1545, 2016) in this way adding power to the social control of authoritarian regimes. This may lead to the conclusion that social sorting in its character is antithetical to democratic principles providing inequality by excluding, punishing, and discriminating certain individuals or groups and also violating privacy rights by its invisible characteristics (Monahan, 2010). Therefore, such system from a democratic point of view seem threatening to citizens' entitled rights. In China's regime, democratic values, privacy, freedom of speech, right of equality are not embedded into the legal foundation of their political system and hence in their social sorting system, with such characteristics not considered as violating. On the other hand these circumstances are rather ambivalent; China is a member of the United Nations (UN), which promotes the importance of democratic values and civil rights. But as China is abusing its power within its borders, by a very weak awareness of civil rights (Zeng, 2016), the assessment on the issue is significantly relevant. Furthermore, from a more technical point of view such a system is certainly not unrealistic to be implemented in western countries as well. The amount of data, already getting selected by the government, could theoretically be used for such structures. Furthermore, credit systems and individual rankings are nothing unusual in Europe and America as well. Another important point is that China is the fastest growing economic power in the world, therefor many western states are concerned that China may use its influence "to reshape the rules and institutions of the international system to better serve its interest" (Ikenberry, 2008). Therefore one may argue that there is a competition of power between western countries and China. This situation may lead the western governments striving to develop a way to establish similar systems, however, not violating democratic core values, to uphold China economically and face it on an equal level when it comes to international relation procedures. Therefore the extent to which western democracies could implement such a system are very limited to the complex foundation of the

democratic structure, which can never be overstep without violating fundamental rights grounded in to the polity of democracy.

2.4.Conclusion

Surveillance today, means the endorsement of various advanced technological systems, which rely on the gathering of an enormous mass of people's private data. One of these systems is the technique of social sorting, which helps governments to execute administrative control, whether it is a democratic or authoritarian government. However, China's regime just introduced a new extreme version of such structure, the *Social Credit System*. Scholars such as David Lyon or Michal Foucault for many years now, critically debate the development of surveillance structures, which inherent crucial issues for the concept of citizenship and of democratic values. This development could lead to a disciplinary society, in which people are not recognized as citizens entitled to rights but consumers in neoliberal structures. Democratic values, human dignity and human rights are at stake as advanced surveillance techniques strengthen authoritarian powers.

3.Method

In this thesis the central research question is evaluated by exploring the discourse about the implementation of a *Social Credit System* by the authoritarian surveillance regime of China (Joye, 2010). Therefore, the method of the discourse analysis is applied to make the process of data collection and analysis as reproducible and transparent as possible and to ensure to provide a solid scientific basis for an argumentation of the case of a western newspaper discourse analysis on the *Social Credit System*.

3.1. Case Selection

For this study the instrumental case of the western newspaper discourse on China's *Social Credit System* was selected, referring to newspapers from Europe and the U.S., because they play a crucial role in facilitating the understanding of the western worlds' perspective on advanced surveillance technology (Baxter & Jack, 2018). In 2014, the Chinese government first introduced the new concept of the *Social Credit System*, which represents a key event in the development of China's advanced technological surveillance state. Its' aim is to generate a trustworthy Chinese society, by using generated, private and tracked data of citizens, in order for China's government to form a score for each individual to determine citizens' "worthiness" to receive government benefits or not, but also thereby making them transparent citizens for surveillance purposes (Mahr, 2018). However, the extent to which the SCS invades citizens privacy through surveillance in comparison to Credit Systems in Europe or the U.S. is much broader and expands to nearly any live situation of Chinese citizens (Mahr, 2018). Therefore, it attracts worldwide attention and facilitates a public discourse in western newspapers about this development.

This case will be examined in the time period from 2014 till today (July, 2018), in order for the study to stay reasonable in its scope. It is an extreme holistic single case, according to Yin referred to by Baxter & Jack (2018), because it represents a study of an observation never done before, as the construct of the *Social Credit System* in China is a very recent development, on which only very little research has been done yet. It stresses the problematic relationship between technological development and western core values, and how these two elements determine a threat to each other. Despite this problematic relationship artificial intelligence is expanding all over the world. Especially, as the competitive mindset of most states strive to keep up with the digital development, it seems unthinkable that Europe and the U.S. go without it or else China will do it anyways. Therefore, this study acknowledges and discusses a highly relevant social change that may affect world structures. Furthermore, media discourse is a very good "site intersected by many discourses, where

discursive and cultural literacy is actively engaged within concrete, historical situations and where meanings are constructed, negotiated and contested” (Yin, p.77, 2007). Therefore, it perfectly has the ability to attain the analysis of the Western World’s perception of China’s development because “news discourse [is] not only a product of a particular ideology but also [a] mechanism to reproduce that ideology [and] has reflective and constitutive force for structural power and ideology” (Yin, p.77, 2007)

3.2. Data Collection

Repatriating to the case selection, western newspapers are the voice of the west’s democratic ideology on this topic. Hence, a total of 35 different western online newspapers (Figure 1) from different European nations and the U.S. were selected. Reasons for the use of online newspapers as data outlet is, that in comparison to the printed versions, who’s “circulation is constantly failing, [online newspapers] are more comprehensive, as they usually include both printed and additional material, offering a rich discourse” (Marciano, 2018). These papers were chosen by the following criteria: first, all newspapers had to originate from the U.S. or an European country, secondly the newspapers’ articles needed to be online accessible for anyone. Additionally, the newspapers need to publish articles in English and/or German language, because I as the researcher do not have the ability to read additional languages. Also the articles had to be published within the timeframe of 2014 till now (July, 2018) because this time represents the key event for this discourse, as discussed above. Finally, articles must have covered the pivotal concepts of China’s Surveillance State, Digital Surveillance or advanced technological surveillance, or Social Credit (Social Sorting). Intentionally a wide range and diversity of different newspapers, from different countries and categories were selected in order to obtain a broad understanding of these concepts discussed and presented in the western world media. Reason being that such a “longitudinal newspaper analysis [can] shed light on global-level awareness and perceptions [...]” (Barkemeyer, Figge, Hahn, & Holt, 2009). Here, the discourse is aimed at shedding light on the western perception on the Chinese advanced technological surveillance state.

Subsequently from these 35 different online newspapers, in total 57 newspaper articles were selected (Figure 1). However, the selection of the articles was primarily done on the coverage of the content and availability of these articles. In other words it was an active search for online articles and not for newspapers. In order to find sufficient articles specific keywords were entered into search systems together with the word China: *Surveillance State*, *Social Credit*, *Social Sorting* or *Social Rating*. Different search engines were used, to “find items that include different declensions, inflections, or conjugations of the words” (Marciano, p.5

2018). In a first step the keywords were used to look for articles in *Lexisnexis* of the University of Twente, from a total result of 998 articles 50 articles were selected. Afterwards this approach was repeated in Google search. Here, another total of 15 articles were selected. Another form of selection was to consider recommended articles in newspapers. Especially in the newspaper *WIERED.uk* or the *ZeitOnline*, these suggestions were very helpful in finding more relevant articles. Furthermore, besides just using the keywords to pick articles, the headings and the content of articles was scanned for protruding words (e.g. social sorting, new surveillance technology etc.), in order to filter useful content for the analysis. Thus, articles were not selected e.g. if these on the first perception only focused on the general concept of the Chinese *Social Credit System*, or if the articles were lacking relevance and necessity in terms of new insights. This relevance was determined by the fact that many articles just acknowledged the fact that this system is in process to be implemented but did not cover issues, situations or benefits such system may bring. After having selected a total of 72 articles these were imported into Atlas.ti to be analyzed.

Selected Newspaper articles:

Bayrischer Rundfunk (1)

Tototale Kontrolle China testet soziales Punktesystem	22 May 2017
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BBC News (1)

China "social credit: Bijing sets up huge system	26 October 2015
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Business Insider Deutschland (1)

Ein neues Vorhaben Chinas zeigt, wie weit die totale Überwachung in dem Land geht	21 March 2018
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Deutschwelle (1)

China experimentiert mit dem gläsernen Bürger	04 January 2018
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Deutschlandfunk (2)

China Guter Bürger, schlechter Bürger?	05 December 2017
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Sozialkredit-System China auf dem Weg in die IT-Diktatur	09 September 2017
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Economist (1)

Big data and government China's digital dictatorship	17 December 2016
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Esquire.com (1)

A "Black Mirror" Episode Is Coming to Life in China	17 March 2018
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Futurism (1)

China's "Social Credit System" Will Rate How Valuable You Are as a Human	02 December 2017
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GameStar.de (1)

Social Credit Rating in China . Bürger – Bewertung mit direkten Folgen	20 March 2018
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Handelsblatt (1)

Germany edges toward Chinese-style rating of citizens	17 February 2018
<i>Human Rights</i> (2)	
China's Chilling "Social Credit" Blacklist	12 December 2017
China's Dystopia Push to Revolutionize Surveillance	18 August 2017
<i>International Business Times.uk</i> (1)	
How China uses mass surveillance and big data snooping to curb social unrest	20 April 2016
<i>Irish Times</i> (2)	
China builds "glorious trustworthiness" with new social credit system	26 June 2016
China using big data to police small details of citizens' lives	1 February 2018
<i>Lawfarblog</i> (1)	
The Cyberlaw Podcast: Interview with Mara Hvistendahl	8 January 2018
<i>London Evening Standard</i> (1)	
Social media is liberating – but it is threatening to enslave us all	10 November 2017
<i>Manager Magazine</i> (1)	
Big-Data-Kommunismus	December 2017
<i>Netzpoliti.com</i> (1)	
Big Brother: Wie sich mit Chinas Scoring-System, Geld verdienen lässt	04 January 2017
<i>NZZ-Neue Züricher Zeitung</i> (4)	
Chinas Datenkrake erfasst alle Lebensbereiche	27 July 2017
Immer mehr Chinesen bezahlen mit ihrem Smartphone – sehr zu Freude von Datenkraken	21 February 2018
Langsam beginnen sich auch die Chinesen um ihre Privatsphäre Sorgen zu machen	21 February 2018
Schau mir in die Augen, Bürger	18 March 2018
<i>Quartz</i> (1)	
China's Communist Party is all in on the power of technology	25 October 2017
<i>RT Deutschland</i> (1)	
"Big Brother is watching you" auf Chinesisch – Der Weg zur totalitären Überwachung	27 October 2016
<i>Spiegel Online</i> (1)	
China: Social Credit System – Ein Punktekonto, sie alle zu kontrollieren	28 December 2017
<i>SWR3</i> (1)	
Wie China seine Bürger digital mit Punkten bewertet	05 December 2017
<i>The Atlantic</i> (1)	
China's Surveillance State Should Scare Everyone	02 February 2018
<i>The Conversation</i> (2)	
China's dystopian social credit system is a harbinger of the global age of the algorithm	15 January 2018
China's plan to put two-faced citizens on credit blacklist isn't all that foreign	30 November 2015
<i>The Guardian</i> (1)	
The tyranny of algorithms is part of our lives: soon they could rate everything we do	05 March 2018
<i>The Independent</i> (3)	

China has made obedience to the State a game	22 December 2015
China to ban citizens with bad “social credit” rating from taking flights or using trains for up to a year	17 March 2018
China wants to give all of its citizens a score – and their rating could affect every area of their lives	22 October 2016
<i>The New York Times</i> (3)	
China’s Technology Ambitions Could Upset the Global Trade Order	07 November 2017
Internet Users in China Expect to Be Tracked. Now, They Want Privacy	04 January 2018
What It’s Like to Live in a Surveillance State	03 February 2018
<i>The Sun</i>	
Inside China’s creepy “social credit” system that analyses internet shopping and social media use in order to blacklist “lazy or wasteful citizens and allow those who behave well to borrow money	05 March 2018
<i>The Washington Post</i> (3)	
Can the Chinese government really control the Internet? We found cracks in the Great Firewall.	21 February 2017
China’s scary lesson to the world: Censoring the Internet works	23 May 2016
The walls are closing in: China finds new ways to tighten Internet controls	07 September 2017
<i>V3 – UK</i> (1)	
China to ban citizens with poor “social credit rating” from public transport	01 March 2018
<i>wccftech</i>	
China’s Orwellian Human Garding System and Tech Companies That Could Help Build It	29 November 2016
Surveillanc States: China Finally Manages to Tie Online and Real-Life Identities	29 December 2017
<i>WEB.de</i> (1)	
Social Credit Rating in China: Neues Überwachungssystem wir bei George Orwell	23 March 2018
<i>WIRED.uk</i> (6)	
Big data meets Big Brother as China moves to rate its citizens	21 October 2017
China forces all app stores to register with the governmnet	16 January 2017
China wants police installed in every internet company	05 August 2015
From imitation to innovation: How China became a tech superpower	13 February 2018
Inside China’s Vast New Experiment in Social Rating	12 December 2017
The West should take note: China’s tech revolution is only just starting	12 February 2018
<i>WSJ</i> (2)	
Chna’s “Social Credit” System: Turning Big Data Into Mass Surveillance	21 December 2016
China’s New Tool for Social Control: A Credit Rating for Everything	28 November 2016
<i>ZeitOnline</i>	
China: Die AAA-Bürger	30 November 2017
China: massenhaft Nutzer – mangelhafter Datenschutz	20 August 2017

Figure 1, Selected Data (Newspapers)

3.3. Method of Data Analysis

The analysis started by establishing items derived from the three main concepts (surveillance state, advanced technological surveillance state and Social Sorting) determined by the theory section. Hence, related to the items, codes were determined; preliminary 52 codes for 9 items

were created. Continuing with the selected articles' analysis, these were read closely and in-depth in Atlas.ti. While reading important words, sentences and phrases within these articles were categorized or assigned to the determined items and codes. This approach helped to analyzing newspaper articles' content and to make it more transparent "as it allows mapping of [the] discursive arena and identification of general patterns and trends that inform the rest of the analysis" (Marciano, p.5 2018). While computing the analysis, articles that were not fitting in the anticipated analytical grid anymore were excluded, after the in depth scanning. This was executed if: 1) their content could not be categorized into the codes or items, or 2) it got clear that these do not talk about the relevant topic, as there were articles that covered China's surveillance techniques but their focus was rather e.g. on biometrical or police surveillance, which did not add information to this case. In total, this re-selection corresponded to 15 articles being excluded from the list, equaling a final sum of 57 articles left for the analysis. Furthermore, also the codes and items while assigning them to the content of the texts could not be used and where therefore excluded as well, because the aim of using these means was to narrow down to the important content. Concluding that at the end 8 items were used, as well as 10 codes (see *figure2*).

Coding scheme:

Concepts	Items	Codes
Surveillance State:	Democratic Structure	Safety
	Authoritarian Structure	Power (abuse)
Digital Surveillance (advanced technology):	Big Data	Surveillance technology, Orwellian
	Dataveillance	Privacy issues
	Algorithm	Fix identities
Social Sorting:	Social Status	Exclusion
	Categorization	Rating
	(Social) Control	Scoring

Figure2, Operationalization of theoretical concepts (Concepts, Items, Codes)

After mapping the content of the articles, a "report" with the collected data (the coded words, sentences, phrases) was exported from Atlas.ti into "Word", resulting in a document with 85 pages and 256 items of data (Appendix I.). In order to approach the discourse analysis in a structured form, the collected data were arranged into five separate sub-sections

determined by the layout of the approach for the analysis: The two main sections are, 1) the Chinese *Social Credit System* illustration in the western newspaper discourse and 2) the Chinese *Social Credit System* assessment in the discourse. In respect to the illustration (1), the discourse was analyzed linguistically because textual discourse is a “blended environment in which different kinds of texts condition each other in order to legitimate certain world views [...] [they] constitute knowledge and social relations, such as a relationship of involvement and compassion with a distant “Other” (Joye, p.590, 2010). The “Other” here is 1) China, constituted by the western discourse in terms of its new *Social Credit System* and 2) the Chinese citizens’ opinion on the *Social Credit System*. Analyzing linguistically striking language used to describe this system and the citizens’ opinion, reveals the western worldview on China’s technological surveillance. This conduction of “discourses create representations of the world that reflect as well as actively construct reality by ascribing meaning to our world, identities and social relations” (Joye, p.590, 2010). The second half of the analysis concentrates on the western newspapers discourse assessment (2), of China in terms of the *Social Credit System*. This part of the analysis differs from the first section in so far, that here, the main focus is on discussed effects and outcomes of the implementation of such a system from the western world’s point of view. Therefore, the analysis will look at 1) the future for China’s citizens determined by this implementation, 2) the striking issues and concerns the discourse express, in terms of Chinese advertisement of the system and general issues of the construct and 3) what and how this development is interacted in the Western World itself. All in all, a strong coherent analysis with the appropriate theoretical foundation is considered here because “social constructionist approaches require that discourse should be empirically analyzed within its social context; text analysis alone is not sufficient” (Joye, p.590, 2010).

Referring back to the collected data, after arranging it into the specific section for the analysis, their content was again carefully and neatly re-read and interpreted, to gain argumentation strength and in-depth reasoning for the respective part of the analysis.

3.4. Conclusion

Summed up, the extreme holistic single case of the western newspaper discourse on China’s new advanced technological surveillance system of *Social Credit*, was approached by carefully selecting 57 online easy accessible news articles, based on previously determined codes. Furthermore, Atlas.ti was used as a mean to analyze the articles’ content in terms of relevance to the topic of the SCS (Appendix I). Hence, an in-depth analysis was conducted by reorganizing the collected data, comprising sentences and phrases assigned to the determined

items and codes, to more detailed categories of 1) China constituted by the western discourse in terms of its new *Social Credit System* and 2) the Chinese citizens' opinion on the *Social Credit System*, 3) the future for China's citizens determined by this implementation, 4) the striking issues and concerns the discourse express, in terms of Chinese advertisements of the system and general issues of the construct and 5) what and how this development is interacted with in the Western World itself. All in all, the aim of this approach was to reach an organized overview of arguments and standpoints in order to extensively analyze the western discourses perception on China's *Social Credit System*.

4. Analysis

To reach an in-depth and clear analysis of the relevant issues and discussions of the western newspaper discourse on China's *Social Credit System*, this section is divided into two paragraphs determined by the two sub research questions. The first paragraph deals with the western discourses' illustration of the SCS concept and its notions and conceptions of the system. The second paragraph concentrates on the western discourses' assessment of the SCS and how the system is reflected in a contextual manner. This implies the analysis of the western perception on effects of the SCS on China's society, the action of the government and the whole world, in order to comprehend the most important and crucial issues the system holds in regard of the western discourse perception.

4.1. Dystopian nightmares, fascination and ethical questions

Accordingly, this first section analyzes the notions and conceptions presented about the *Social Credit System* by the western world newspaper discourse. First of all, the analysis starts off by evaluating the rhetorical devices of this discourse. It is expected that this observation shows how the discourse is structured by the western journalists, utilizing the implemented figures of speech and the linguistic constructs, used to set emotional accents. This is done to gain a deeper understanding about the argumentations and judgments used. Secondly, this paragraph aims to look further into the presented opinions of Chinese citizens on the *Social Credit System*. The purpose, here, is to determine certain perspectives delivered by the western newspaper articles when describing opinions on the system and therefore gain deeper understanding of the perception of the western world on the *Social Credit System*.

Subsequently, online newspaper articles that discuss the *Social Credit System* are evaluated. The articles' discourse is filled with stylistic elements to deliver conceptions, opinions and estimations about the SCS. It presents an overall unanimous picture to the western audience, "reflecti[ng] and construct[ing the western] structural power and ideology" (Yin, p.77, 2007). The discourse is marked by two distinctive observations: On the one hand, the media discourse is reflecting the SCS as a thoroughly negative and worrisome development for China's citizens, and on the other hand it is presenting an incredulous amazement for the technological possibilities given by the realization of the system itself.

Therefore, for one an atmosphere of "shock" (Article 14.1.), "fear, [...] worry, [...] horror" (Article 13), and "anxiety around the world" (Article 14) is created by the discourse, when describing the implementation of the SCS. It is characterized as "creepy" (Article 18), and "terrifying" (Article 22). Especially, when civil liberties, privacy and surveillance structures are depicted the discussion is very negatively charged. The SCS is defined as the

system that by its structure and effects is “violating citizen’s freedom” (Article 23), as it threatens their freedom of expression and speech (Article 23). The same statements are formulated about the SCS when referring to the violation of individual privacy because of “pervasive surveillance” (Article 13) on citizens. The system is anticipated as practicing “surveillance that is repressive” (Article 13) and inescapable (Article 8). Such rhetorical expressions on the SCS strongly represent and support the argumentation Monahan (2010) suggested referring back to Lyon, who is forecasting and describing the new surveillance technology as being “pervasive [and] undreamed of [...]” (Monahan, p.96, 2010).

On the other side the anticipated impossibility of such a system being enforced in China can be clearly observed through the used adjectives describing the SCS. An article in the newspaper *The Conversation* states for example: “fascination around the world” (Article 14) when looking at the discussion on the SCS, it is perceived as this “highly ambiguous big-data system” (Article 7), which feels too implausible to people to be realistic and therefore is seen as “futuristic” (Article 22). An overwhelming and amazed feeling is evident with a sensational undertone delivered to the western audience. The illustration of the SCS is also delivered by the use of strong metaphor construct this overall picture of worry, fear and tension of fascinated disbelief. The most striking and most commonly expressed metaphors used to refer to the *Social Credit System* are the following: “Orwellian” (Article 19), “dystopian nightmare” (Article 7.1.) or references to the third season of the Netflix series “Black Mirror” (Article 7). It is necessary to acknowledge the epistemology behind these terms, in order to recognize their strong impact in explaining or describing the SCS. The term *Orwellian*, derives from the dystopian novel “1984” by George Orwell, which pictures a dystopian story very close to the situation of China now. In the novel people are living in a world of constant surveillance by Big Brother and they have no right of freedom, privacy or even simple pleasures such as sex, and get punished if they do not comply with the ruling ideology. Therefore, the term “Orwellian” is a perfectly strong metaphor to describe the *Social Credit System*; it catches all major characteristics of the system given by the western media. Thus, as Monahan (2010) refers to Lyon, he also uses the term in a figurative sense as surveillance being the “worst Orwellian nightmare” (Monahan,p.96, 2010) as well as being a “Dystopian nightmare” (Article 7.1.). Dystopia is the opposite of utopia and according to the Merriam-Webster dictionary „an imaginary place where people lead dehumanized and often fearful lives“ (Merriam-Webster, 2018). Describing China’s development as such, powerfully underlines the fundamental disregard of human rights and human dignities the western discourse depicts. Lyon (1994) e.g. states that his domain of surveillance studies evokes the

Orwellian scenario and that it therefore „must be [called] the study of Big Brother“ (Lyon, p.57, 1994). Big Brother as the figure in society, which puts the life of citizens under totalitarian methods of surveillance where the only limit is the technological „surveillance capacity“ (Lyon, p.57, 1994) and when applying this reference to China it allows to view the technological surveillance capacities as a measure which reaches so far that people are being scrutinized in nearly every possible life situation, including camera surveillance in every shop and apps surveilling people's online behavior. This gathered information then determines the Social Credit Score individuals reach, by which they are ranked and through which „Big Brother“ defines peoples access to necessary live resources. For the Communist Party of China, according to this discourse, this is

„basically a big data gamified [using their] surveillance method“ (Article 19). A game of obedience using a „combination of sticks and carrots“ (Article 7.1.), to hold their citizens in the country with an „iron fist“ (Article 7.1.).

This refers back to the punishing (sticks) and rewarding (carrots) characteristics of the SCS. On the one hand, the system lures citizens in by rewarding them if they comply with the rules; making them favor the system because of its benefits for themselves. On the other hand, “China [is] ban[ning] citizens with bad „social credit“ ratings from flights or using trains“ (Article 16.1.) thus punishing them by e.g. taking away their choice to leave the country. This is violating an entitled human right, the “freedom of free movement“ (Art.13 UDHR). This observation in combination with the argument by Kroener & Neyland (2012) give sings to the fact that both mechanisms are actively and passively, forcing citizens to stay in China and simultaneously are an equivalent to Weber’s „iron cage“, which Foucault saw as reminiscence to the panopticon to form a “disciplinary society“ (Kroener & Neyland, 2012).

Furthermore, articles written in German often use the term „Datenkrake“ (Article 2.) to describe the SCS, translating into “data octopus“. This term implies a system with multiple means to gather individual data, many arms of the octopus as metaphor for algorithm and capacity to collect citizens’ digital information, which generates many benefits for China’s government. An octopus „grabs“ things, to “grab” something from someone has a negative implication: “grabbing” data can apply to the process of forcing invisible data gathering, which is an unrecognizable process for the person the private data is collected from. This relates to the argument of Monahan (2008) concerning new surveillance techniques, observing people and forcing them indirectly to hand out private information (Monahan, 2008). Thus, the use of the term “Datenkrake” derives originally from a nationalistic propaganda phrase used in the 19th century to describe “an overwhelming, four-armed, even

amorphous power” (Schulz, 2012) to describe Jewish citizens. It is a figure of speech used by Nazis to stigmatize the Jewish population as the “dark threat to the world” (Feuerherdt, 2016). Using this figure of speech to describe the “threat” of the SCS is a questionable attribution, because it implies an analogy to the Jews, and therefore is still anti-semitically charged.

The western newspapers state that the *Social Credit System* is a threat to any citizen and a game for the government to gain advantages. Still, the West seems to be fascinated that such a dystopia can actually become reality. However, it is ironic that such a development is still a surprise to many in the West and that rhetorical questions like:

„Did we think Black Mirror was fiction?“ (Article 23) or is „Big Brother out of control?“ (Article 19) „What will happen when these systems, charting social, moral and financial history of an entire population, come into full force?“ (Article 19)

are asked in articles. These questions are also considered in the scientific discourse and are chosen by authors like Orwell literature because developments of new advanced technological surveillance have been a topic of many theoretical approaches for many years (Lyon, 2015b), e.g Orwell, Foucault, or Lyon. Considering the long history these theoretical examinations, the surprising tone communicated by the western media seems strange.

All in all, the discourse is charged with concerns about the outcomes of the SCS and with it the raising fears for the concept of citizenship, as „the real question about the future of trust are not technological or economic; they are ethical“ (Article 19).

After giving an in-depth insight on how the western discourses’ rhetoric picture is drawn on the concept of the SCS, the western discussion about the Chinese citizens’ opinion on the implementation of this system will be analyzed. This is done to further evaluate the western perception of China’s structure, from Chinese citizens’ judgment on the implementation of the system.

From the western point of view, two main opinions are surrounding the implementation of the SCS in China’s social and structural context itself. On the one hand the western media articulate that a large number of China’s citizens are not voicing concerns about this development because they argue that they will “not be badly affected by it anyways” (Article 2.), or it seems “not to be a problem” (Article 20.1.) for them. From a western world point of view, this approach to the system communicates acceptance and seems to be nothing “unusual” (Article 20) for China’s citizens. Monahan’s (2008) argument supports this observation of the discourse too. He argues that people do not seem to be fully aware of the significant impact of such a system on their rights and by that it gets normalized and accepted in society anyways (Monahan, 2008). They are “willingly giving out their private details” (Article 20.1.) to the advantage of private companies and the government.

However, this accepting attitude of some Chinese on the development of the SCS, anticipated by the western newspapers, is just one perspective. The western discourse observes “divided opinions” (Article 20.1.) on the development in China:

“A survey from 2017 by China states [...] that leaking personal data was the No.1 concern among consumers [in China]” (Article 17). The need to protect privacy and private information is said to be increasingly discussed by Chinese citizens. Leading to “concerns of privacy; many are wary of allowing the Communist Party access to many personal details [...]” (Article 7) and they are just worried (Article 20.1).

Even though there are these concerns, the “resistance against this system is very low” (Article 9.1). This may have different reasons. From a theoretical perspective according to Weller (2012) for example on the one hand, people do not voice their concerns about surveillance structures because of the privileges and benefits the system entails for them, e.g. in terms of welfare and careers (Weller, 2012). On the other hand, the authoritarian structure seems to pressure people not to express their opinion. People get punished if they present a different opinion than the CCP’s, resulting for example in suppression and neglect of individuals’ fundamental human rights (such as Art. 13 UDHR), leading to the dehumanization of people. Therefore, as stated in an article in *The Irish Times*, people rather accept the top-down implemented life changes by the CCP, rather than creating their individual “dystopian nightmare” (Article 7.1.) when resisting.

4.2. Totalitarian, Faithful Credit System

The next main component of this analysis implies the western discourses’ assessment of the *Social Credit Systems*. This analysis aims to uncover the western world's opinions and predictions about this system, not only in regard to China but to the whole world. Differing from the prior section, it is not focused on stylistic devices and linguistic means, but rather it is aimed at examining the effects of the SCS on society itself. Therefore, this section is again divided into three subsections to make the analysis more transparent. First the implications of the western discourse on the SCS’s outcomes for Chinese citizens are elaborated on. This is expected to deliver a broader picture of inherent issues of the SCS. Next, the Chinese government’s advertisements on SCS in their local media are observed from the western discourse perspective. This should show the different understandings of both perspectives and give insight into the most striking worries and issues the western discourse expresses on this development. Finally, the attention is shifted from China to western world countries’ technical surveillance development. This is a very important aspect of the analysis as it provides the opportunity to compare and evaluate the argumentation the discourse on the SCS provides to the development in the West.

Firstly, *The Independent* (Article 16) published a conversation with Beijing-based novelist and social commentator Murong Xuecun, who argues that with the implementation of the *Social Credit System*:

„China is moving towards a totalitarian society where the government controls and affects individuals’ private lives [...] like Big Brother who has all your information and can harm you in any way he wants“ (Article 16).

As mentioned above, it is observed that citizens do not voice their concerns and even “change their behavior” (Article 9) to the favor of the system, e.g. only paying with the phone, not walking over a red light, always following the government's ideological requirements and avoiding to attract any bad attention. This obedience encourages China’s government in its intent to uphold their “harmonious socialist society” (Kshetri, p.302, 2016) and “strengthens social management [...] by recording the entire digital presence of individual citizens” (Zeng, p.1457, 2016). Therefore, adding to Botello’s (2012) and Zeng’s (2016) arguments that new structures of surveillance technologies support the authoritarian regimes in its abusive power (Botello, 2012), because it suppresses individuals in the name of ideology (Zeng, 2016). Subsequently if people integrate the structures into their everyday life, because of the governmental external pressure, these structures are “becom[ing] the new normal” (Article 19) in China’s society.

For many Chinese, following the “notion of credit (or xinyong) has cultural meaning that relates to moral ideas of honesty and trust” (Article 15). China’s society is afraid and has “anxiety about pianzi, or swindlers” (Article 19.1.), which is deeply rooted into China’s culture. Therefore this cultural pressure seems to result in people striving to keep a good Social Score for the system, which becomes the new social norm and gets established as a societal “status symbol” (Article 19). At the same time, China’s government presents the SCS as “China’s Social Faithful System” (Article 19), and advertises it as a positive and useful system to uncover swindlers because now people can “verify each other’s credit worthiness” (Article 19) to check if people are worthy doing business with. Including that, the SCS advertisement in China presents a system that “builds a culture of “sincerity” and a “harmonious socialist society” where keeping trust is glorious” (Article 16). This again supports the theoretical statement by Keshetri (2016) above. However, “what is moral and what is immoral is only determined by the Communist Party” (Article 12) and people are only behaving decent if they “believe in the socialist core values” (Article 19). Therefore, according to the Chinese government’s advertisement it is a tool strengthening the trust within society by helping people to uncover liars, and “bad” behaving fellow citizens. This has the effect that even though the SCS is “voluntary as of yet, [...] it’s already having consequences”

(Article 19). Lucy Peng, Ant Financial chief executive, states that they “will ensure that the bad people in society don’t have a place to go, while good people can move freely and without obstruction” (Article 11). This inhabits authoritarian structures by exercising repression, implying privileges or punishment, disciplining citizens in ways to enhance desired behavior, exactly as Monahan (2008) defines a social sorting system. Furthermore, *SpiegelOnline* (Article 11) conducted an interview with Kühnreich, a political scientist, who follows the development of the SCS, which explains how Peng’s argumentation is finding ground in China. She states that the future of Chinese citizens will be determined by their behavior and everyday action:

“e.g. people will not be able to get an insurance, because their credit score does not show any sufficient exercise accomplishments. Many of today's voluntary users of the system are not aware of the fact that the data they are feeding to the system is strongly influencing their future” (Article 11).

The *Social Credit System* as a status symbol in China, affects citizens’ behavior as it entitles either punishment or rewarding, according to behavioral compliance to the CCP’s ideologies. These effects trigger “competition within society” (Article 21). Now people may be more eager to work for the best score within their capacities. This could imply competition not only in the work field but also in every scenario of individuals’ life: from buying items, the timeframe of watching TV, to the aspect of friendships. Concluding, that this system feeds into social inequality and stagnating social mobility in China. According to Koskela (2012) minority groups will be the most affected by such structures because surveillance technologies are not fair; they often only negatively target minority groups, as these systems are run by the societal majority, which scrutinizes the minority (Koskela, 2012). Also it is most likely that citizens with the same credit score will exclude other people with a lower score, creating a social bubble for themselves to gain benefits and increasing their Credit Score. It will make networking and socializing with people from other social status groups nearly impossible.

The discourse further communicates the issue for China’s citizens that people are becoming self-focused, which could lead to a very egocentric society. It could have the effect that people isolate themselves because they need to watch their behavior to protect their Social Score. Contrarily, people are constantly pressured to surveil each other or calling on them to be cautious about their behavior (Article 19). This behavior is mostly conditioned by the fact that the Credit Score of one person will influence the Credit Score of another, if they are associated with each other (Article 19). That is why “people will have an incentive to say to their friends and family “Don’t post that. I don’t want you to hurt your score but I also

don't want you to hurt mine" (Article 19). The development of people surveilling each other shifts the task of a governmental Big Brother, to "the digital panopticon [that] lacks Big Brother wrestling information from use against our will. Instead we lay ourselves bare voluntarily" (Han, 2017).

Overall, in comparison to the theoretical background the western discourse has quite a different approach evaluating the outcomes of Social Sorting Systems. The western newspaper discourse describes the inherent and social issues of inequality, labeling, and class structures, when looking at the effects of the SCS. Whereas theoretical discourse is about the effects of the technological advanced surveillance for other countries and what the fundamental development implies for political structures.

China's government sees the SCS as a "pioneering system" (Article 19.1) supporting the core values of the Republic of China. However, from the western point of view it is comparable with a system that takes after the structures of a "21st-century police state" (Article 20).

Apart from the inherent unequal structure determined by the western media, another more general problem is observed: the CPP does not communicate the measures taken and algorithms used for selecting and ranking their citizens. The selection criteria for and justification of the ranking is therefore intransparent and unclear for the general public. It "creates a new socialist utopia under the Communist Party's benevolent China and uses data to enforce [its] moral authority" (Article 16), but no one knows how. The discourse further argues that it is "not only an establishment of a totalitarian police state that monitors its people but one that completely evades users' privacy" (Article 4). This development of "the all seeing-eye for the government alarms civil liberties and privacy advocates worldwide" (Article 13).

Lyon (2015a) observed that surveillance of today is not limited to borders or specific places, but it rather is an invisible and automated process because of digital data and the Internet (Marx, 2002). It makes it extensively dangerous for privacy, as people are only subconsciously aware of observations and collection of private data. For many actors of the western discourse it is controversial that the Chinese government receives the data of the citizens for their sorting system mainly from the private company Alibaba. The main concern with this cooperation is the question of ethics; is "it ethical for private companies to assist in massive surveillance and turn over their data to the government?" (Article 13). Another conflict this "cooperation" creates is that the CCP has managed to avoid the trouble with accusations of others on them evading privacy rights. "In a case of doubt the private

companies are going to be responsible for the violation but never the Chinese government” (Article 20.1.). In the western discourse the private data of individuals is described as the new “Gold currency” (Article 9), which has an equivalent value to oil (Article 9). Therefore private data has become the new valuable trade good between government and companies, in the 21st century. This is also connected with the argument that Monahan (2010) states: citizens are not recognized as citizens any longer, but as mere consumers instead. Therefore rights attributed to citizenship are not valued anymore and people are only entitled to rights of consumerism. By this, information about online behavior is not perceived as something that has to be protected, but instead is viewed as an economic good. This justifies the creation of the “transparent citizen” (Article 9.2) and creates a neoliberal world order (Monahan, 2010). Therefore the trade and gathering of private information in this ground structure cannot be perceived as a violation of privacy or human rights.

Concluding, China’s advertisement of SCS as the “Faithful System” (Article 19) in order to “keep glorious trust” (Article 16) in society, seems more like a pretext to implement a system which gives the most benefits to China’s government from a western point of view. Benefits, in the sense of financial benefits implying the increase of political power. Simultaneously citizens increasingly lose their entitlement to fundamental rights as they are viewed as consumers in a neoliberal structure. Furthermore, according to the western discourse the SCS is also a one sided exploitation by the Chinese government, who sees it all (Article 13), whereas the citizens themselves cannot comprehend the government's actions and the approach of the *Social Credit System* (Article 16).

All in all, this analysis of the western discourse on China's *Social Credit System* discusses its effects on issues of privacy, human rights and ethical problems arising from the development of such technology utilized by an authoritarian regime.

However, when talking about advanced technological developments in surveillance procedures, their implementation in democratic countries should not be ignored, as well as, the discourse in western newspapers about it. Even though e.g. Botello (2012) and Zeng (2016) state in theory, that these new technologies are especially “charming” for authoritarian regimes, because new surveillance techniques support the “zero tolerance” policies of authoritarian surveillance practices (Botello, 2012) and with the use of centralized data, dataveillance and algorithmic surveillance these technologies are becoming one of the most powerful mean of totalistic surveillance (Zeng, 2016). Yet, democratic states equally often use data based techniques to surveil citizens with the justification to “protect citizens against threats” (Weller, p.59, 2012) and to generate security (Koskela, 2012). Therefore, the question

occurs how far fetched the consideration is that data usage in democratic countries is not as violating and worrisome as the data based technology used in authoritarian regimes, like China. The argument democratic states use of their intention being fundamentally altruistic using such technologies, must be critically observed. Western articles discuss the resemblance between China and the West in terms of this development:

“it is not hard to picture [...] most of that already happens, thanks to all those data-collecting behemoths like, Google, Facebook and Instagram or health-tracking apps” (Article 19) “Socio-economic credit systems are not confined to China. Most industrial nations have relied in credit ratings for decades [and more and more] social factors are increasingly being included to make more accurate predictions” (Article 14).

Still, it is argued that because of the fundamental democratic structures in western states the extent of such a development could not go as far as in China. Nonetheless, western credit agencies are “exploring new ways of assessing consumers’ ability to handle loans” (Article 14.1.). Western banks are “looking for ways to lend money to –and collect fees from– people with no traditional credit history” (Article 14.1). Also it should be critically discussed what e.g. differentiates the “Schufa” or a health insurances record in Germany from the retrieve of a Social Credit Score in China: “German health insurer will offer you lower premium if you don’t get sick as much. They may offer you even better premiums if you share data from your fitness-tracking device to show you’re doing your part to stay healthy” (Article 5). But in Germany this commitment is still a free choice and mostly refers to private insurances, also public health insurance in Germany are obliged to accept people, no matter what. Equivalent to the Chinese social sorting mechanism, however, is the fact that “scores” are applied to classify individuals with the intent to give the ones with higher scores preferential treatment. Furthermore, it should be kept in mind that the constructs of credit systems are a Western concept. “In China e.g. only the minority owns a credit card, whereas in the U.S. the credit card record determines most of the majority data collection of citizens” (Article 10) and such “scoring systems have been present in the West for decades” (Article 19). These systems are obviously not constrained to authoritarian regimes which makes them, from a western perspective, everything else but “less concerning” (Article 14). Democratic states are:

“not subjected to a government effort to “build a better citizen”, as the Chinese [but still they are also] not doing much to prevent the private sector from conducting not-entirely-dissimilar data-mining investigations into million people [...]” (Article 14.1.).

Therefore, this also “contributes [...] to neoliberal subjects who approach the world through the eyes of consumers rather than those of citizens entitled to rights” (Monahan, p. 96, 2010)

in democracies. Nevertheless it is argued that the “West will have rules – especially where the state is involved [whereas in contrast to China] the minority could result in a digital dystopia“ (Article 3.). Here, Germany sets a good example “becoming the first European Union nation to tighten rules on foreign corporate acquisition; this ensures that Germany retains control over critical technologies“ (Article 6). Also in contrast to the Chinese government, a democratic government “can’t legally compel [citizens] to participate in some massive data-driven social experiment“ (Article 19.1). In times of rapidly changing digital and political structures, which imply danger for individual privacy and the constant worry of invisible surveillance by any state, the western discourse nonetheless relies on the construct of democratic policies and norms to limit the technological data gathering and surveillance in democratic states. „Yet foreign governments need to take stronger and more systematic action“ (Article 6) in order to keep the development of private companies in check and securing the dignity of their citizens (Article 6). Also, if critically elaborating on the assumption of the western discourse that in democratic structures such harmful development of surveillance cannot occur, it is questionable what this means for example in terms of the new police policy implemented in parts of Germany by the CDU in the name of “prevention of crimes” (Vlogt, 2018). It gives police the right to take action before a crime occurred, this includes surveillance of individuals’ activities on social media (Vlogt, 2018). Therefore it is essential to note here, that such structures of police practices come very close to the SCS’s implementation of a 21st century police state because both structures, strictly surveil individuals in any life situation without clear consent of the individual, also these surveilling structures are not concerned about privacy, in order to execute governmental tasks.

Concluding, the SCS is according to the claims of the Chinese government a system to support cultural values based on trust and giving citizens the opportunity to react on and be secured from liars and fraud. However, from a western point of view the SCS is assessed as a system that creates a 21st century police state as the totalitarian power of China becomes increasingly compelling. It is argued that this is not only increasing social inequality but is also producing an even stricter class system determined on the Social Credit Score they gain. Furthermore, the discourse reflects the concerns about the data used by the *Social Credit System*, which are mainly gathered by private companies and sold to the government, creating a neoliberal construct in which the sense of citizenship and with it the value of fundamental rights vanishes. Simultaneously, the government trades data with companies, as these become valuable goods for the Chinese system. Finally, evaluating the digital developments in the western world itself demonstrates the awareness of similar trends of surveillance approaches

within the media discourse analyzed here. However, it is insisted that the extent of such developments are protected by the democratic structures and their inherent norms and rights.

4.3. Conclusion

The general perception of the western discourse seems to be that the *Social Credit System* limits freedom, the right of privacy and fundamental human rights of Chinese citizens. It creates a dystopian environment in which, inequality and competition within society are highly visible e.g. by filtering citizens according to their favorable behavior conforming to the CCP's ideology. This negative perception of the SCS differs substantially from the Chinese's advertisements presented as a faith supporting system, which strengthens trust in society. According to the western discourse, China's citizens quietly tolerate the implementation of the SCS, obeying the structures to prevent bigger harm for themselves, resulting from the punishing structure, which are inherent in the SCS. Furthermore as having analyzed the discourse concerning the advancing technological surveillance structures of credit, categorization, and dataveillance in the western world there seems to be a similar development to China that is challenging the structure of democratic states. Still it is argued in the western discourse that the extent of such system is protected, from the democratic jurisdictional point of view, and therefore cannot exceed its antidemocratic and violating features for human rights in the West.

5. Conclusion

Finally the findings of the western newspaper discourse analysis from 2014 to July 2018, will here be linked to the theoretical approaches in this research field. To overall contextualize and to explicitly work out the new insights found in regard to the research question: “*How is the discourse on the technological advanced surveillance state of China illustrated in the media of Europe and the United States?*”

First of all, the findings of this analysis show that the western discourse describes two notions when discussing China’s SCS. On the one hand the discourse is dismissive of the SCS, its structures and characteristics regarding democratic core values, because it is perceived to violate citizen’s freedom, privacy and other fundamental democratic rights. According to the western discourse, the SCS is implemented by the Chinese government in order to support the CCP’s ruling ideology and works with punishing or rewarding mechanisms to discipline their citizens to obey it. This is in line with the dismissive provided theoretical valuation to describe the SCS, such as Monahan (2010) states is the “worst Orwellian nightmare” (Monahan, p.96, 2010) and again refers back to already elaborated theoretical concepts of social sorting, suiting the authoritarian structures of China, because of its antidemocratic and scrutinizing practices (Haggerty, Lyon & Ball, 2012). On the other hand the western discourse expresses fascination about the fact that China’s government is able to implement such an advanced surveillance technology.

The theoretical approaches evaluated here state that even though studies about the development of digital surveillance are available since the 1980s this seems not be “on the radar of most ordinary citizens” (Lyon, p.142, 2015b). This assumption was confirmed in the newspaper discourse by expressed shock and surprise about the implementation of the SCS in China. Generally, the conceptions of this system observed in the discourse were not new, as they are in line with those presented in the theoretical discourse to describe advanced social sorting technology. However, the most extreme expression used for the SCS, in the newspaper discourse was by the *Neue Züricher Zeitung*, the metaphor “Datenkrake” (Article 2) referring to the practice of digital data gathering as forceful and violent because it is invisible and conducted without consent. However, the use of such a term seems inappropriate, considering the antisemitic historical background of this term.

Furthermore, the scientific observations by Botello (2012) and Zeng (2016) state that the structure of surveillance technologies support authoritarian regimes’ abusive power, which matches findings from the western discourse, here it is argued, that because of the SCS, China is moving towards an even stricter totalitarian society in which the government controls

and affects citizens' private lives (Article 16). Through this unfolds both the theoretical and the western public conception on technological advanced surveillance that actually come into live, which makes these new insight on this topic so valuable.

Even though these problems are observed in the discourse, it still is assessed, that the new structures become the new normal in China's society because the people do not voice their concerns. Reason being that they may fear the authoritarian regime will scrutinize them when expressing opposed opinions to the CCP's ideologies (Article 16), or as Weller (2012) unanimously argues, because they rather take in the privileges the system entails for them. However the western discourse shows that the CCP's advertisement on the SCS, directly tackles China's deep culturally rooted fear of swindlers (Article 19.1). Which positively affect the acceptance of the system, also because many citizens seem not to be aware of the effects of the system, challenging human rights and the extent of the invasion of individual privacy to gather data. Other effects the SCS inherent, according to the western discourse are that it may trigger competition within society, it creates social bubbles with individuals of the same Social Score, excluding lower score citizens in order to protect their own score (Article 21). Which not only implies stagnation of social mobility and inequality but isolation of individuals aiming to protect their score, but also implies surveillance of fellow people close to each other (Article 19). This mutual distrust within society in order to secure necessary privileges provided by the government, leads to citizens now surveilling each other and make the Big Brother task of the Chinese government more irrelevant (Article 19, Han, 2017).

The main issues expressed by the western discourse on the SCC are, that it is intransparent, and therefore a one sided approach. China's government as the all seeing-eye (Article 13), whereas citizens cannot comprehend the categories and algorithms used to categorize them. Overall it becomes very clear that the focus of the western discourse on the SCS is not technological development but its inherent ethical issues (Article 19). Firstly, it is said to violate human rights, privacy and democratic core values, secondly it is described to also shift the political structure and with it changes the understanding of citizenship. Supported by Monahan (2010) argument, that governments cooperating for example with private companies, influence such shift. In China's case, the CCP receives private data of individuals mainly from the company Alibaba. This makes those data as valuable as gold and oil (Article 9), it changes into a currency which reduces citizens' fundamental rights and establishes customer norms, which do not include e.g. the protection of privacy, free speech or movement (Article 9).

Surveillance studies by e.g. Monahan (2010) show that this neoliberal structure is also introduced by democratic states. But the western discourse communicates for example by the newspaper *The Conversation*, that such structures, however, are not implemented with the same intentions as in China although the western government has done very little, in their opinion, to prevent such development too (Article 14.1). Thus, the argumentation in the discourse continues by saying that the legal structure and the fundamental rights in democratic states will protect their citizens from the threats of such a system (Article 6).

All in all, this analysis provides, through the lens of the western newspaper discourse, new insight on the development of China's SCS considering human rights, the issues of inequality, privacy, and free movement and free speech. It also shows that for one, because of these inherent issues of the system, the Western World is very concerned and worried about this development as it endangers human dignity and ethical protection of people, resulting in dehumanization. Also because of the neoliberal world order such implementation encourages it gives another reason of worry for peoples' entitlement to fundamental rights.

Even though, the *Social Credit System* is still in its beginning and not much research is done about it yet, this study may serve as an impulse for many other studies on this topic. The analysis has its limitations in not having the the capacity to observe all media outlets, or to do surveys on western populations itself on this development. It would be very interesting if the findings could be replicated or done with broader and bigger data sources, especially after the *Social Credit System* will be fully implemented in China, in 2020.

This study may also contribute to raise awareness of the general public about deteriorating effects of such systems on citizens entitled rights and democratic structures. Furthermore, from the findings of the analysis and the theoretical approaches the necessity for western governments to evolve and adjust their policies to protect their citizens in their "digital live" next to their "real live" becomes were urgent . The European Union Agency For Fundamental Rights, is one of the institutions acknowledging the needed changes from a governmental point of view and is invested in "ensuring that fundamental rights are promoted and protected online in the same way and the same extent as in the offline world" (FRA, 2018). Also Germany is "becoming the first European Union nation to tighten rules on foreign corporates acquisition; this ensures that Germany retains control over critical technologies" (Article 6), Therefore this study's findings, can provide data to substantiate the need for such investments.

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