



Article

(Mis)representing terrorist threats: Media framing of Bill C-51

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Abstract

On Friday, 30 January 2015, Steven Blaney, Minister of Public Safety and Emergency Preparedness, introduced Bill C-51, also known as the Anti-Terrorism Act in Canada's House of Commons. This article delineates research into the media coverage of Bill C-51 in the month after its introduction, prior to its legislation. A qualitative content analysis of 23 articles from five Canadian news sources (*National Post*, *The Globe and Mail*, *The Toronto Star*, *The Tye*, and *rabble.ca*) was conducted. Data were coded and analysed using the qualitative research software NVivo 10. Themes that arose from the data include: terrorism and our need for protection; production and reinforcement of fear; oversight, accountability, and abuses of power; and dystopic future and 'big' government. Findings show that the differences between alternative and commercial news sources were not as evident as much of the literature regarding the differences between the types of media would hypothesize.

Keywords

alternative media, Bill C-51, Canada, media analysis, online news, policy, qualitative research, terrorism

Introduction

On Friday, 30 January 2015, Steven Blaney, then Minister of Public Safety and Emergency Preparedness introduced Bill C-51,¹ also known as the Anti-Terrorism Act, in Canada's House of Commons (Open North, 2015).² Bill C-51 authorizes 'Government of Canada institutions to disclose information to Government of Canada institutions that have jurisdiction or responsibilities in respect of activities that undermine the security of Canada' (The Anti-Terrorism Act, 2015). Further, the bill enhances the government's ability to

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regulate and prevent air travel by establishing new powers for ‘identifying and responding to persons who may engage in an act that poses a threat to transportation security or who may travel by air for the purpose of committing a terrorism offence’ (The Anti-Terrorism Act, 2015). In addition, Bill C-51 permits increases in maximum sentences ‘to keep the peace relating to a terrorist activity or a terrorism offence’ (The Anti-Terrorism Act, 2015). Bill C-51 also amended the Criminal Code

to provide for an offence of knowingly advocating or promoting the commission of terrorism offences in general. It also provides a judge with the power to order the seizure of terrorist propaganda or, if the propaganda is in electronic form, to order the deletion of the propaganda from a computer system. (The Anti-Terrorism Act, 2015)

As part of this Act, the Canadian Security Intelligence Service (CSIS) gains new powers ‘to take, within and outside Canada, measures to reduce threats to the security of Canada, including measures that are authorized by the Federal Court’ (The Anti-Terrorism Act, 2015).

Once legislated, Bill C-51 made many changes that potentially affect all Canadians, and not only the ‘terrorists’ that the bill sets out to track, apprehend, and detain. One particularly interesting aspect of Bill C-51 was how different media outlets identified the issues associated with potential increases in governmental power. In the articles used for this research, from both commercial and alternative sources, most of the reporters are taking issue with the bill – not for its new powers – but because it lacks specific details regarding the regulation of these new powers. The media framing coincides with the dominant hegemonic discourse of the government, justifying its legislation to increase its power while assuring the public that they will be protected. The concept of framing used coincides with definitions of framing used by De Vreese (2012) who highlights the fact that frames are often described differently for each project. For this article, a frame is a ‘central organizing idea or story line that provides meaning to an unfolding strip of events, weaving a connection among them. The frame suggests what the controversy is about, the essence of the issue’ (Gamson and Modigliani, 1989: 143). One thing to consider while looking at the frames discussed here is the ‘need to take all actors seriously, that is, both the political advocates and their framing of an issue and the journalists and their prioritizing, reframing, and autonomous framing’ (De Vreese, 2012: 372) particularly as some authors are both journalists and political actors. Many articles do not critique Bill C-51 for the rights that may be removed from ‘regular’ Canadians, but rather seem to support the new practices the bill would implement. The largest issues with Bill C-51 include the further entrenchment of an ‘us vs them’ dichotomy, which I argue is inherently racist in the context of ‘terrorism’, the removal of privacy rights, and the potential criminalization of legitimate protest. Most of the articles focus on oversight or lack thereof for Bill C-51, which is problematic because, rather than discussing the impact of the bill itself on Canadians, many authors focus on tertiary issues regarding implementation of the bill.

While discussions of Canada’s interactions with anti-terrorism legislation exist (see Brabazon, 2006; Roach, 2005), there appears to be a lack of discussion regarding media coverage and response to this legislation, which provides the opportunity for an article to

bridge the gap between media framing *and* law. The articles were analysed to investigate the frames used by commercial and alternative news outlets in the discussion of Bill C-51. Notably, the differences between alternative and commercial news sources were not as evident as much of the literature regarding the differences between the types of media suggest.

Literature review

While Bill C-51 appears to be a brand new law that allows for the removal of civil liberties and freedoms, an established history of governments, including the Canadian government, have pushed and continue to push towards greater state controls and power in the name of protecting the people from 'terrorism'. In Canada, the Anti-Terrorism Act of 2001 that extended the government's reach was critiqued because it allowed for the inclusion of political dissent and protest as 'terrorist' activity (Brabazon, 2006: 13).

While Gies (2015) focuses on the media coverage of the Human Rights Act in the UK, her discussion of the ways in which news outlets frame legislation that makes it difficult to find alternative frames can be applied to media coverage of Bill C-51. Media outlets spoke against the government's narrative of the 'National Identity Card Scheme' and questioned how forced identity cards could be used to violate human rights and civil liberties (p. 28). 'Us vs them' frames are commonly used in media representations of terrorism as found in the media analyses of Gies (2015), Cooke (2003) and Bhatia (2015).

Like the Anti-Terrorism Act of 2001 (also known as Bill C-36), Bill C-51 aims to expand the powers of the police and other governmental agencies (Roach, 2005). Anti-terrorism bills in Canada focus on the current government's lack of power or authority to protect the public from terrorist activity. However, terrorism is not a 'new' phenomenon of the 21st century with Canada's most prominent examples being the FLQ crisis of 1970 and the Air India bombing of 1985 (Roach, 2005: 511). Norris et al. (2003) highlight shifts in responses to terrorism post-9/11, suggesting that fears of terrorist activities are rising despite the decreasing risks of terrorism. Continuing to focus on creating a culture of fear regardless of actual risks allows strong governments to legitimize violence against weaker nations and thus maintain their positions of power without question from their citizens (Chomsky, 2009); such a focus is problematic at best. Traditional news sources often rely on presenting a government-supported frame for viewing terrorism, whereby the government focuses on creating a fear of 'terrorists' and the 'other' to garner more power (Norris et al., 2003). This project was an opportunity to examine how alternative media frame terrorism when compared with their conventional counterparts.

McChesney (2008) notes that governments and media producers have power over the production, distribution, and consumption of media, particularly as an audience may have difficulty consuming alternative views if they are not easily accessible. In addition, McChesney (1999) investigates the potential impact that alternative news outlets have to democratize media and infers their potential cannot be ignored. Knowledge of, accessibility to, and the availability of alternative news sources appear to be the largest barriers to identifying non-hegemonic views. I also suggest that the fact that many alternative news sources are primarily or exclusively online may affect their accessibility as not everyone has internet access. Further, not knowing where to find alternative news outlets

and not seeing them as credible may provide further access barriers as many alternative news outlets lack resources that ensure visibility (Skinner, 2012). McChesney (2008) discusses how market demands do not separate the demands of advertisers and editorial content produced by the media, acknowledging that the economic power of advertisers dictates most of the content produced. In addition, and perhaps more important when examining media framing of a political bill, is the impact of political power on media production. Political power helps to dictate what content is produced by media, in part because governments hold regulatory and licensing power over media outlets, and in part because there is a mutually beneficial relationship between government and media where the government works with media to distribute information to the public.

The distinction between alternative and commercial media, for the purposes of this article, is simply that commercial media are owned, operated, and funded through traditionally commercial avenues, as part of large conglomerate businesses. The alternative media outlets are funded through donations, although they also rely on some advertising money to compete with traditional news outlets. Much of the existing literature regarding the differences between alternative and commercial media suggests that alternative media outlets without the influence of corporate power become a space of resistance to traditional media outlets and their perspectives (Atton, 2001; Kozolanka et al., 2012). While it may be assumed that alternative media are always ‘left wing’ or ‘progressive’ in nature, this is not always the case, as alternative media are considered to be alternative because they are outside of large concentrated corporate power.

Further, some scholars note that alternative media do not necessarily have to be counterhegemonic (Hackett and Carroll, 2006) and, as such, alternative media, like some of the sources used in this project, may echo the frames used in mainstream media. Kozolanka et al. (2012) note that alternative media are often discussed as outlets completely free of the frames used by commercial media and/or governments, although they position their book against this perspective. Alternative media outlets may provide an *opportunity* to operate outside of expected frames; however, the articles included in this study demonstrate that although alternative sources may disagree with governmental or commercial frames, authors still engage with Bill C-51 from those frames. Kenix (2015) argues that many alternative news outlets follow similar structures to commercial media regarding subscriptions and content to remain in operation. Some alternative media outlets, particularly those that provide news stories, are pressured into following the same patterns as commercial media including visual standards, use of advertisements, and content. It is easy to see that definitions of alternative media are tenuous and controversial. For the purposes of this article, alternative media are considered to be media that are independent from corporate ownership. The alternative media used in this project (The Tyee and rabble.ca) are alternative due to their ownership and structure.

Frames are inextricably linked with ideology and certain frames are used to support certain ideological positions (Reese et al., 2001: 145–146). The ideologies presented by the Conservative government in Canada focus on ‘national security’ (Conservative Party of Canada, 2016) which reinforces the idea that the framing of Bill C-51 promoted by the government and the newspapers that align with the government focuses on Bill C-51’s ability to protect ‘national security’.

Methods

Articles that discuss Bill C-51 were gathered from three traditional newspapers with online access and two online news sources between 30 January 2015 and 28 February 2015 on Bill C-51. The selected papers were the *National Post*, *The Globe and Mail*, *The Toronto Star*, The Tyee, and rabble.ca. As mainstream national papers with a large audience *The National Post* and *The Globe and Mail* were obvious choices to study the content of media discussions of a national legislative change. *The National Post* is owned by Postmedia, a corporation designed to compete with global conglomerates that owns a majority of the newspapers across Canada (Brownell, 2014). As a paper with a capitalist minded nature that is beholden to corporate stakeholders and advertisers, *The National Post* has a tendency to be fairly 'right' wing and pro-Conservative government (Worldpress.org, 2016). For example, *The National Post* has officially endorsed the Conservative Party in all but one election since the newspaper began election coverage in 2000 (Bradburn, 2015); however, while *The National Post* supported the Liberal Party in 2000, Izzy Asper, the owner of the paper, penned a separate editorial promoting the Conservatives (Bradburn, 2015). *The Globe and Mail* has a complicated history because it technically began as an independent paper, which was then purchased by Bell Canada (one of the largest media conglomerates in Canada), and eventually repurchased by the Thompson family to be independent of Bell in 2015 (Pellegrini, 2015). Notably, as of data collection for this article, Bell Canada still had a 15 percent stake in *The Globe and Mail* and as such was part of corporate control.

The Toronto Star provides a potentially localized frame in their presentations of Bill C-51, and is more 'left' than the national papers as an independent paper; *The Toronto Star's* policies are informed by Atkinson³ principles which include the 'belief that a progressive newspaper should contribute to the advancement of society through pursuit of social, economic and political reforms' (*The Toronto Star*, 2015b). The Tyee and rabble.ca were selected as alternative news sources that provide different viewpoints, have different structures, and are not-for-profit organizations. This sample is purposive in that articles were selected from each news source based on the amount of coverage and discussion of Bill C-51 each article contained. The articles were located using keyword searches for 'Bill C-51' and 'Anti-Terrorism Act' on the website of each news outlet and reading each article from that news source that contained the keywords. Some articles were omitted from my research due to brief mentions of C-51 as a 'jumping off' point for broader discussions about terrorism or because they were duplicates of another article. This work aims to highlight the specific coverage of Bill C-51 rather than discussions of anti-terror rhetoric in Canadian media and, as such, only articles that addressed the specifics of Bill C-51 were included for analysis, yielding a relatively small sample size.

I completed a qualitative content analysis to look at the framing of Bill C-51 to understand *how* different media discuss the Bill. NVivo 10, qualitative research software, was used to code data and illuminate themes surrounding the framing of Bill C-51. A grounded theory approach was used in this project to allow the development of organic themes; grounded theory allows themes to emerge as data are coded inductively rather than imposing preconceived themes on data (Palys and Atchison, 2014; Strauss and Corbin, 2015). Initial themes were consolidated into broader themes and then analysed. Themes

discussed in this article focus on the frames used by both the articles on their own and the newspapers in which the articles were located. Specifically, coding was completed through a line by line read through of each article pulling out *how* the authors were discussing Bill C-51; for example, when an author was using language such as ‘Orwellian’ or ‘Leviathan’, these portions of the article were coded as ‘dystopic’ and language that centred around ‘fear’ or ‘evil’ were coded as the production and reinforcement of fear. The coding process was iterative in that all articles were coded three times to ensure that themes were fully pulled out of the articles and the themes were refined in the secondary and tertiary coding rounds.

Findings

My findings include one section analysing the different types of frames that occur within each of the five different news sources. The remaining four sections contain the major themes that emerged from the coding process: terrorism and our need for protection; production and reinforcement of fear; oversight, accountability, and abuses of power; and dystopic future and ‘big’ government.

Differences between news outlets and content

The articles tend to present, at the very least, questions regarding the implementation and/or content of Bill C-51. Only 2 out of 23 articles put a positive spin on Bill C-51; one of these articles was written by Peter MacKay (2015), current Conservative MP and former Minister of Justice, and the second by SA McCartan (2015); authors of these particular articles both argue that other countries have stricter laws more in line with Bill C-51, so Canada should as well. Not surprisingly, both articles supporting Bill C-51 appeared in *The National Post*, which as noted above is known for its relatively conservative, right-wing approach. Table 1 presents the breakdown of articles by news source that fall into three categories: positive, which encompasses articles that support Bill C-51, the way it was written and presented; questioning, which contains articles that are neither completely positive nor negative;⁴ and negative, which includes articles that reject Bill C-51 outright. Unlike the articles analysed by Gies (2015) where the news outlets rejected the governmental frame, most of the articles looking at Bill C-51 discussed the bill from the frame set out by the government, particularly emphasizing the need for protection from terrorism.

The articles were authored by a mix of journalists, politicians, and academics which certainly impact the analysis as each author’s perspective will have a particular bias. In particular, the articles by politicians seemingly have a strong partisan bias as seen in the articles written by Peter MacKay (2015) and Tom Mulcair (2015), who both present arguments that align with their respective parties. However, as noted above, articles were selected because they dealt with Bill C-51, and not because of the perspective they presented. Further, while author perspective is an important aspect to consider, an article must go through the editorial process before being published, which insinuates that the biases of the news outlets may be of greater importance for analysis than the biases of individual authors. Because the articles collected for this research were all available to

Table 1. Framing of Bill C-51 by news outlet.

News outlet	Positive articles	Questioning articles	Negative articles	Total number of articles
<i>National Post</i>	2	3	0	5
<i>The Globe and Mail</i>	0	4	0	4
<i>The Toronto Star</i>	0	2	4	6
The Tyee	0	2	2	4
rabble.ca	0	1	3	4
Total number of articles	2	12	9	23

the Canadian public, including articles from politicians as well as articles from journalists and academics, they provide a full picture of the information presented to the Canadian public in the month following Bill C-51's announcement.

As demonstrated in Table 1, half of the articles question the value and implementation of Bill C-51, while a further 9 articles are negative. The alternative news outlets (The Tyee and rabble.ca) present a more negative view towards Bill C-51, which is to be expected given the lack of ownership by big corporations and monetary contributions from consumers (rabble, 2015; The Tyee, 2015). Surprisingly, *The Toronto Star* had the largest number of negative articles, despite its characterization as a mainstream paper. *The Toronto Star* claims to follow the Atkinson principles which valorize civil liberties and social justice (*The Toronto Star*, 2015b), which would explain the questioning of the government's call for protection against 'terrorists'. Admittedly, the sample of *The Toronto Star* was also the largest of any news outlet. The differences in content between news outlets could have been much greater; however, the general tendency of the national outlets to be more supportive of Bill C-51, when compared to the alternative and left-wing news sources, seems to reflect expectations of content based on political affiliations. The articles rejecting the government's dominant hegemonic framing of the need to fear 'terrorism' belong in the 'negative' category, while the articles that support the framing are all 'positive' or 'questioning'.

Many popular alternative news sources follow similar patterns regarding subscriptions, visuals, and are even content to 'compete' with commercial media and continue operation (Kenix, 2015). Similar to the commercial media used for this project both The Tyee and rabble.ca rely on online advertisements on their webpages as a funding source. One may argue that because The Tyee and rabble.ca use advertising support to keep their outlets competitive with traditional outlets that they could not be considered alternative media sources as their content would be influenced by their advertisers. However, I argue that to stay competitive with commercial media, editors of alternative outlets, like The Tyee and rabble.ca would be drawn to similar content to commercial media to stay competitive for consumers. In addition, the alternative outlets have visual layouts and navigation very similar to commercial media, where the news is separated into traditional sections including, but not limited to, business and opinion. In terms of content, as demonstrated in Table 1, it is evident that the differences between the alternative media and commercial media are not nearly as great as some scholars and existing research suggest. It appears that the alternative media in this project operate in similar ways to commercial media.

The frames and themes discussed in this research are inextricably linked both to the authors and publishers of the articles as well as to the overarching ideological standpoint of the Harper government. The Conservative Party of Canada's self-proclaimed ideological standpoints include standing

for sovereignty and a strong national defence; open federalism and national unity; free enterprise and individual achievement; and the opportunity for all Canadians, regardless of background, to achieve their dreams in a safe, healthy, and prosperous country. (Conservative Party of Canada, 2016)

While the Conservative government states that its ideology includes the above, scholars such as Smith (2012), Gravelle et al. (2014), and Mookerjee (2011) all make notes of ideological positions of the Harper government that support and counter the stated ideologies. Smith (2012) highlights that Harper's government was consistently focused on increasing defence both in terms of spending and in 'taking a leadership role in its military missions abroad' (p. 23). Like most, if not all, elected governments, the Conservative party focused on pleasing their constituents who supported the party. However, the Harper Conservatives played to their primarily Western base, who supported very specific foreign policies, including stricter immigration, which helped to bring in support from Quebec (Cody, 2008). Gravelle et al. (2014) note that voters who identified as Conservatives were more likely to support military interventions and, as such, I argue that the actions of the Harper government are more likely to benefit or placate Conservative voters rather than *all* Canadians. Mookerjee (2011) highlights the continuing issues with racism in Canada and focuses on the issue of Islamophobia, which I maintain is exacerbated by Bill C-51 particularly through the media framing of terrorism as an 'us vs them' issue.

The promotion of Bill C-51 fits within the scope of the Conservative Party's mandate, specifically its focus on 'strong national defence'. However, Bill C-51 arguably does not achieve or follow the last standpoint regarding the opportunity for *all* Canadians, especially in light of continual racial profiling; similar concerns were raised in articles that question or reject the government's frame regarding the necessity for Bill C-51 as something that 'protects' Canadians.

Terrorism and our need for protection

Since Bill C-51 has been dubbed the 'Anti-Terrorism Act', it follows that each of the 23 articles focuses on terrorism, and the need to protect Canadian society from the danger terrorists pose. When Prime Minister Harper announced Bill C-51, he said that 'jihadists' had declared war on Canada and 'they [jihadists, ISIS, and 'terrorists' in general] want to harm us because they hate our society and the values it represents' (Behrens, 2015, from rabble.ca). Harper seems to promote framing Bill C-51 as protecting the public from the ominous and ubiquitous 'terrorists'. Some articles (e.g. MacKay, 2015, from *The National Post*) buy into this frame regarding the need for protection from 'terrorists' while others outright reject the frame (e.g. Behrens, 2015).

One article supporting the 'terrorism and need for protection' frame predictably comes from Minister Peter MacKay, then an elected member of parliament from the

Conservative Party. The main idea presented by the government regarding Bill C-51 focused on the need for governmental protection from ‘terrorists’ and, as such, members of the Conservative Party would reinforce those ideas in media. For example, Minister MacKay states

The world has been shocked by recent atrocities perpetuated by jihadi terrorists. We have witnessed outrageous acts of violence by extremists who attack those that don’t share their narrow and oppressive ideologies. As a result, acts of terror have been carried out across Western nations, most recently in France, Belgium, Australia, Denmark and here at home in Canada. Today, we are part of a global struggle against brutal extremism, including in the fight against ISIL [Islamic State of Iraq and the Levant]. (MacKay, 2015)

The hyperbolic and emotional language employed by MacKay, e.g. ‘atrocities’, and the ‘global struggle against brutal extremism’ help to create and reinforce a frame that generates a relationship between ‘us’, or the ‘good guys’, and ‘them’, the violent ‘terrorists’.

Further, MacKay’s use of language suggests that currently Canada is ill-equipped to protect the public from ‘them’. Thus, MacKay frames his article to garner support for Bill C-51, by highlighting the notion that ‘terrorists’ are a real threat to Canada and arguing that Bill C-51 is the only way to protect Canada. MacKay briefly assuages potential concerns about the oversight, or potential issue for government abuse of these new rights stating:

The government’s focus is on serious threats to the security of Canada, such as espionage, sabotage and foreign-influenced clandestine operations, as already outlined in the CSIS Act. Our security agencies are interested only in those who pose a serious threat to Canada’s security.

Reinforcing the idea that ‘we’, the general public do not pose a threat to Canada like ‘terrorists’ do, MacKay further promotes the frame of terrorism being a fight between ‘us’ and ‘them’, as well as reassuring the public that Bill C-51, is only needed to protect us from ‘terrorists’. MacKay engages in this form of othering and seeks public trust in the government’s mandate to safeguard ‘us’ from ‘them’.

In contrast, Bob Rae (2015, from *The Globe and Mail*), former interim leader of the Liberal Party of Canada states:

For the record, I take terrorism seriously. I know for certain it exists, and I know it poses a threat to Canadian citizens and to our country. And I also believe in better accountability and review for those agencies to whom I for one am prepared to grant powers to watch, intrude, and disrupt, provided they do so respecting our laws, including the Charter.

Rae’s position is clear; he promotes the framing of Bill C-51 as a potential answer to the need to protect Canadians from terrorism. However, he questions Bill C-51 based on the potential lack of government and CSIS ‘accountability’ rather than questioning the frame used by the government or issues regarding privacy or civil liberties. The notion that ‘terrorism’ is a threat is not questioned, nor is the impression that the ‘war on terror’ creates a false dichotomy between ‘us’ and a rather fictional, or at least inflated, ‘them’. Like MacKay, Rae is part of the governmental parties that supported Bill C-51, so in light of their positions in government it follows that neither Rae, nor MacKay, would question the government’s frame regarding terrorism.

On the other hand, writing in alternative news source rabble.ca, Matthew Behrens (2015) subverts the frame of governmental protection from ‘terrorism’ by framing his argument as the government creating a way to protect themselves. Behrens looks at Bill C-51, not as a way for the government to protect ‘us’ from ‘terrorism’, but as a way for the government to curb legitimate opposition. His frame places the government in the position of a criminal and those who ‘work for justice, our solidarity with those unjustly targeted, and our loving resistance to the criminal actions of this government and its agencies’ as the victims of Bill C-51. His production of content for alternative news outlets and his activist work against the government clearly indicate that Behrens is not part of the groups that would support the calls for increases in governmental power under the Harper government. Perhaps Behrens’ outsider and oppositional status from the Harper government allows him to break free from the frame dictated by the government using an alternative news outlet.

Production and reinforcement of fear

As noted above, PM Stephen Harper announced Bill C-51 as if it were part of an election campaign. ‘The prime minister talked about a growing “great evil” Canadians need to be scared of in the form of violent jihadists wanting to kill anyone “who does not share their narrow and oppressive world view”’ (Nuttall, 2015b, from The Tyee). Behrens (2015, from rabble.ca) described the scene of the introduction of Bill C-51 when ‘Harper declared: ‘violent jihadism ... is not a human right. It is an act of war, and our government’s new legislation fully understands that difference.’ His use of language dictates that Canadians should be fearful of ‘terrorism’ because of its imminent threat to Canada. Not only is ‘terrorism’ seen as a legitimate threat, but PM Harper’s language clearly promises that the Canadian government will protect you. MacKay (2015, from *The National Post*) insinuates that NDP leader Tom Mulcair and the Official Opposition at the time do not support Bill C-51 because they are not in touch with the ‘reality’ of the threat of ‘terrorism’. It seems that MacKay (2015) believes Mulcair is not fearful enough of the ‘terrorists’, or is not ‘man’ enough to combat it, because he opposes the bill, rather than acknowledging Mulcair’s (2015, from *The National Post*) own statements that he opposes the law because of its potential impacts on privacy, governmental opposition, and potential abuses of power. In his article in The Tyee, Nuttall (2015a) supports Mulcair’s hesitancy regarding the legitimacy of Bill C-51 also arguing that current laws are sufficient to protect Canadians from ‘terrorism’, and implying that the government is using the bill to create a false dichotomy of ‘us’ versus ‘them’. Martin (2015, from *The Globe and Mail*) notes that ‘Mr. Harper [is] hyping the terror threats Canada faces, as opposed to allaying the public’s fears’ in a demonstration of the government’s frame that Canadians should constantly fear ‘terrorism’. Some authors including Rae (2015), Walkom (2015, from *The Toronto Star*) and Tieleman (2015, from The Tyee) perpetuate fear by reminding the public of past ‘terrorist’ incidents such as the shooter on Parliament Hill and the FLQ crisis of the 1970s that led to the creation of CSIS and a removal of ‘secret police’ activities from the RCMP.

Tieleman utilizes the security involved with entering the studios at CTV as a point of reference for our heavy focus on security as Canadians, and suggests that instead, we

should fear how the government might use Bill C-51 against unsuspecting members of the public. Palmater (2015, from rabble.ca) also works within the framework of fear, but in this instance refers to fear of the government turning Indigenous protestors into 'terrorists' by the government potentially reframing environmental, Indigenous, and political protests as 'terrorist' functions. It appears, therefore, that the production and reproduction of fear exist as a frame that is perpetuated regardless of news outlet or authorial perspective; the primary differences between articles are *who* and *what* we should fear.

Oversight, accountability, and abuses of power

All 23 articles focus on the expected frame of Bill C-51 providing legal oversight to CSIS and other laws the implementation of the bill would impact if it passed; only 3 articles focus on adequate oversight existing within Bill C-51 for all of the changes being made (Atkey, 2015, from *The Globe and Mail*; MacKay, 2015, from *The National Post*; McCartan, 2015, from *The National Post*). I argue that the frame regarding oversight is particularly problematic because it does three things: it assumes that the bill was already law; it places the focus on the use of the bill by the government and how the government can or cannot/should or should not use the bill; and it fails to discuss how the bill has the potential to impact Canadians, including discussions of legitimate protest. Coyne (2015, from *The National Post*) discusses the fact that Bill C-51 should not be lauded as perfection or completely demonized, but rather that a discussion of the impact of the bill and ensuring oversight over its jurisdiction are integral before it is passed. On the other hand, the remaining articles express concern that the implementation of Bill C-51 places CSIS, the judiciary, and other parts of the government in a position to abuse their power because the bill fails to address oversight adequately. Further, the potential for abuses of power also leaves the government in a position to oppress legitimate opposition (e.g. criminalizing protests for Indigenous rights or environmental causes) (Mulcair, 2015, from *The National Post*; Palmater, 2015, from rabble.ca). The major frame and issue that most articles take regarding Bill C-51 is the amount of oversight, or lack thereof, for the new abilities of CSIS, rather than focusing on the other issues with the bill, such as the removal of freedoms and privacy rights as Forcese and Roach (2015, from *The Toronto Star*) discuss. Again, I highlight the issues with this frame as many authors first treated the bill as though it was already part of legislation and second accepted all the changes to laws surrounding privacy and freedom without question rather than addressing the flaws with Bill C-51.

Geist (2015a, 2015b, 2015c), a Professor of Law at the University of Ottawa, wrote three articles for different news sources (The Tyee, rabble.ca, and *The Toronto Star*) that focused on the issues associated with both the media and the Official Opposition in their emphasis on a lack of oversight as the main issue with Bill C-51. Geist (2015b, from The Tyee) writes:

The opposition parties' decision to focus on oversight is unsurprising given the weakness of the current system and the absence of any meaningful reforms within the proposed legislation. Yet the problem with focusing chiefly on oversight is that it leaves the substantive law (in the case

of CSE internet surveillance) or proposed law (as in the case of C-51) largely unaddressed. If Canada fails to examine the shortcomings within the current law or within Bill C-51, there is no amount of accountability, oversight, or review that will restore the harm to privacy and civil liberties.

It was refreshing to see that at least one writer, who reaches a fairly large audience by contributing to three separate news sources including *The Toronto Star*, mentions the issues of staying within a frame that accepts the legitimacy and need for Bill C-51.

In *The Toronto Star*, Geist (2015a) focuses on the ways in which Canadians are already being illegally targeted in the cultivation and sharing of online information in what Mosco (2014) would deem 'big' data. The argument here is that the rights of Canadians under current laws are not being protected to begin with, so why should Canadians believe the government when they say that more intrusive laws will not harm them if members of the public are not engaging in 'terrorist' activities. Behrens (2015, from rabble.ca) states that Bill C-51 'will also invite the Canadian courts to approve dirty tricks and illegal acts, and provide immunity to those whose 'good faith' actions break the law and abuse human rights in acts that may constitute torture' thereby echoing the sentiments presented by Geist.

All three articles that indicate a belief in the sufficient accountability and oversight provided by Bill C-51 appeared in the two national papers (Atkey, 2015, from *The Globe and Mail*; MacKay, 2015, from *The National Post*; McCartan, 2015, from *The National Post*). It is not surprising, that those who produce content for the mainstream news outlets would follow the framing process of the government and not allow for a frame that provokes dissent towards government agendas and initiatives. As Herman and Chomsky (2002[1988]) note, the 'size, ownership and profit orientation' of a news outlet accounts for a specific type of editorial bias. Of the articles found in *The National Post* and *The Globe and Mail*, none presented a negative stance towards Bill C-51, which makes sense as both news outlets are large, profit-oriented national papers, owned by Postmedia Network Inc and Globe Media Group respectively. This editorial bias is countered by the alternative news sources of The Tyee and rabble.ca which have generally smaller audiences due to their alternative nature, are run by donations and are not-for-profit organizations (rabble, 2015; The Tyee, 2015). The most surprising data came from *The Toronto Star* as it circulates widely within Ontario, and is well known on a national level. Further, *The Toronto Star* is owned and produced by 'Toronto Star Newspapers Limited, a wholly owned subsidiary of Torstar Corporation' (*The Toronto Star*, 2015a) and is designed to make a profit like its national counterparts. It appears that the legacy of Joseph E Atkinson, one of the founders of the welfare system in Canada and a well-known leftist, has continued even after his death and *The Toronto Star* continues to produce relatively 'leftist' commentary (Honderich, 2015).

Dystopic future and 'big' government

Nineteen of the articles thematically highlighted the fact that despite its role as a Conservative government in a neoliberal⁵ system, PM Harper's Conservatives wish to have increased control over their constituents' lives. Wilson (2015) highlights the

implementation of Minister's Caucus Advisory Committees by the Harper government as one example of how increased bureaucracy was used 'to centralize and consolidate power with the prime minister at the expense of individual ministers' and thus consolidate power in the hands of a select few over all of Canadians (pp. 243–244). In addition, to the notion of 'big' government, many articles including Nuttall's (2015b, from *The Tyee*) *Inside the Orwellian Launch of Tories' Anti-Terrorism Act*, reference to the potential of an Orwellian or dystopic future tied to the implementation of Bill C-51. Martin (2015, from *The Globe and Mail*) discusses how the state is becoming more intrusive, with 'tentacles' invading everything and describes our current government as a 'Leviathan'. The sentiment of a large, looming government is echoed by Glavin (2015, from *The National Post*) who weaves words and ideas from Orwell throughout his article stating 'Orwell always insisted that democracy's undoing begins with the casual debasement of political language, which inexorably compounds the diffusion of slovenliness in thinking, and round it goes.' The use of Orwell insinuates that Bill C-51 is what will casually 'debase' political language, something that Nerenberg (2015, from *The Toronto Star*) and others fear will happen due to the incredibly loose definitions of 'terrorism' and 'terrorist activities'.

Not only is there a general fear of a dystopic future in which privacy will be compromised (Forcese and Roach, 2015, from rabble.ca), but the fear also extends to the criminalization of legitimate government opposition, such as those who protest against pipelines, or oppressive governments in other locations (DiManno, 2015, from *The Toronto Star*; Geist, 2015c, from rabble.ca; Glavin, 2015, from *The National Post*; Mulcair, 2015, from *The National Post*; Palmater, 2015, from rabble.ca). As noted earlier, the fear of legitimate dissent becoming 'illegal' with the implementation of new laws, particularly those with 'emergency powers' is not unique to Bill C-51, as it has been of concern at least in Canada since the 1970 invocation of the War Measures Act of 1914 (Brabazon, 2006). In addition, Nerenberg (2015) fears the impact of Bill C-51 on those who oppose certain actions by the Canadian government. Because Bill C-51 is unclear and fails to detail all the activities and powers it bestows on CSIS and other Canadian organizations in the name of 'preventing terrorism', there is a fear that the government will be able to equate legitimate governmental opposition with 'terrorism'. Further, some fear that Bill C-51 will be used as a deterrent for any opposition to the government because of its harsh penalties and the increase in potential for government propaganda; Martin (2015) writes 'it's not just the accrual of powers that is oppressive. There is the unrelenting application of propaganda and intimidation.' If used in a particular way, Bill C-51 could result in no governmental questioning or opposition from the people owing to the delegitimization of opposition by criminalizing it, as well as the promotion of government propaganda that enforces the ideals of the government.

Mendes (2015, from *The Toronto Star*) frames his article as though PM Harper was making a Faustian deal to maintain power. The public likes to hear that the government is doing something to protect them, and the election style rhetoric associated with Bill C-51 uses language that promotes and reproduces fear; in turn, this suggests Harper is not only assuaging public fear but also fashioning a culture of fear that allows him to play the 'hero'. The public believes (or is convinced) that some liberties should be curtailed to prevent 'terrorist' attacks (DiManno, 2015). However,

Benjamin Franklin warns us that ‘those who sacrifice Liberty for Security deserve neither.’ Stephen Harper has gone one worse by sacrificing both Liberty and Security in the desire to cling to a transient seat of power. (Mendes, 2015)

Baglow (2015, from *The Toronto Star*) echoes the sentiments of Mendes, also utilizing the words of Benjamin Franklin. Baglow (2015) suggests that ‘if we have nothing to fear but fear itself, we should all be plenty terrified by now’ given Harper’s need for power and his willingness to do anything to maintain his position. Even if the need for protection from ‘terrorists’ is legitimate, many issues with Bill C-51 remain, given its large reach into the lives of unsuspecting members of the public and the fact that it is a huge violation of our liberties. Mendes (2015) argues that Harper has traded the liberty and security of the public to maintain power in Canada.

In addition to a focus on the invasion of privacy highlighted by legal scholars Forcese and Roach (2015), they also demonstrate how the bill might impact others because threats to the government include ‘activities aimed at changing or “unduly influencing” any Canadian government by force – or merely “unlawful means”.’ Activities ‘aimed at changing’ the government appear to include protest of almost any kind including students protesting tuition increases, protests against the building of pipelines, and calls for reform of the government in any way, as all three protests ‘aim to change’ the actions of the government. While no article mentions *A Handmaid’s Tale* in its discussion of the dystopic nature of Bill C-51, its presentation, and implementation, one cannot help but be reminded of the secret police known as the ‘the Eyes’ coming to take Offred, the narrator of the story, away in the middle of the night because she had potentially broken a strict law of Gilead (Atwood, 1985). As many of the articles’ authors suggest, we should fear and oppose Bill C-51 as it is just one of many steps that can and do take away rights and freedoms to protect us from a nebulous enemy, in this case, ‘terrorists’.

Conclusions

A total of 23 articles from 5 different news outlets were inspected using a qualitative content analysis. The results of this investigation demonstrate the connections between the frames used in the articles and the news source where the articles were located. News outlets like *The National Post* and *The Globe and Mail*, both known for their conservative views, disseminated articles that were more favourable towards Bill C-51, and did not include any articles that dismissed the bill outright. On the other hand, alternative news outlets, The Tyee, and rabble.ca, in addition to *The Toronto Star*, all contained articles that questioned aspects of Bill C-51 or outright rejected its implementation. As noted above, McChesney (2008) focuses on the media’s connection with government and the resulting production of frames and stories that support the government’s narrative. Because of their alternative status, The Tyee and rabble.ca do not have the same connections to the government, and as such, their content has the ability to critique the government’s narratives. *The Toronto Star* also contained four articles that completely rejected the frames presented by the government, which as noted above may be due in part to its continued adherence to the beliefs of Joseph E Atkinson, founder of *The Toronto Star*.

Four major themes arose from a qualitative investigation of media coverage of Bill C-51. The first theme was the concept of terrorism and our need for protection which appeared in all 23 articles. Even the articles that disagreed with the implementation of Bill C-51 took a frame that focused on the idea of terrorism and the need to prevent it even though they thought Bill C-51 was not the right way to do so. The second theme dealt with fear and its reproduction. Some articles such as MacKay (2015) and Baglow (2015) discussed fear within the same frame as the government narrative; fear is produced and perpetuated by the government through the creation of a dichotomy that puts Canadians against 'terrorists'. The language used by Harper in his speeches and by MacKay (2015) indicate that fear is integral to the government's narrative surrounding terrorism because if the public fears 'terrorists' the government gets away with passing laws that may negatively impact the public by heightening fear; by presenting the laws as protection, the government alleviates these fears.

The third theme involves oversight, accountability and the potential for abuses of power. Atkey (2015) and others felt that the current oversight of CSIS and new measures of oversight presented in Bill C-51 are sufficient to protect the public from any potential abuses of power. The remaining 18 articles described the oversight of Bill C-51 as insufficient and having the potential to be used against legitimate opposition to the government. Michael Geist (2015a, 2015b, 2015c) explained that a discussion of Bill C-51 using the government-friendly frame of oversight ignored the major problems associated with the bill. Geist suggested that discussing Bill C-51 through the frame of oversight and accountability of the government sacrificed an important discussion about the privacy and freedom-limiting impacts of the bill. The fourth and final theme was the impression of a dystopic future including a 'big' government. The main dystopic features discussed in this theme revolved around Orwell and the subject matter presented in *1984*, where 'Big Brother' and the government had entirely too much power over the world and the actions of its citizens.

The importance of this project stems from the fact that Bill C-51 is a continuation of the consistent removal of civil liberties by governments in the post 9/11 age. However, what makes the media coverage found in Canadian sources regarding Bill C-51 unique is the fact that the frame presented by the government is rarely questioned, unlike previous media analysis of similar acts that infringe upon civil liberties in the name of protection as demonstrated by authors such as Gies (2015). This article bridges discussions regarding the framing of 'terrorism' and anti-terrorist legislation with the political economy of traditional and alternative news outlets to provide a glimpse into the ways in which Canada responded to terrorism under the Harper government. The framing of Bill C-51 emerged out of the social relationships between the government and the public in the case of articles presented in the national, for profit, news outlets. While the alternative news media and the relatively left-leaning *Toronto Star* provided alternative frames and views to the government's narrative, many articles at the very least adhered to the focus on oversight rather than on the issues with privacy and 'terrorism' as primary concerns.

While some existing literature suggests alternative media outlets provide perspectives or frames that differ from commercial media (Atton, 2001) the alternative media articles in this dataset often approach Bill C-51 from the same frame, particularly oversight, as

commercial outlets. While the alternative media outlets tended to question or reject the narrative of Bill C-51 presented by the government, the articles still adhere to the frames used by the government and commercial media outlets. Scholars such as Kozolanka et al. (2012) and Hackett and Carroll (2006) highlight the ability of alternative media outlets to be democratizing and radical forces to hegemonic practices in the media. However, as noted by Kenix (2015), many of the more popular alternative media outlets adopt practices from commercial media to be competitive for consumers. Both *The Tyee* and *rabble.ca* are alternative media in that they are non-profit organizations that do not rely on corporate interests; however, at least in the case of the coverage of Bill C-51, they echoed the same frames and issues demonstrated by commercial media. The main concerns with the proposal of Bill C-51 demonstrated in *all* of the articles, both commercial and alternative, were issues of oversight of new powers rather than a question of what impact the bill could have on Canadians. Arguably, alternative media sources adopted the governmental and commercial framing of Bill C-51 as a starting place to dismantle the accepted arguments regarding terrorism and the ‘need’ for stronger governmental powers. However, it appears that even a majority of articles from alternative media outlets followed the lead of commercial outlets and failed to provide an in-depth discussion of the fundamental problems with Bill C-51, as a way to increase governmental authority, while it was being discussed by parliament in the month following its election-style announcement.

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Notes

1. The full title of the act is an Act to enact the Security of Canada Information Sharing Act and the Secure Air Travel Act, to amend the Criminal Code, the Canadian Security Intelligence Service Act and the Immigration and Refugee Protection Act and to make related and consequential amendments to other Acts (The Anti-Terrorism Act, 2015). For the purposes of brevity and clarity, the proposed act is referred to as Bill C-51 throughout this article.
2. At the time of data collection and analysis (March 2015), Bill C-51 had not been legislated. The bill was passed on 18 June 2015. However, the 2015 federal election, and subsequent Liberal majority government leaves the longevity of the legislation in question as the Liberal party has promised to ‘repeal the problematic elements of Bill C-51, and introduce new legislation that better balances our collective security with our rights and freedoms’ (Liberal Party of Canada, 2016).
3. Journalist Joseph E Atkinson was appointed editor of *The Evening Star* in 1899. He accepted the editor position based on adherence to two conditions: ‘The Star would be independent of any political party and he’d be paid \$5,000 a year, \$3,000 in cash and the rest in shares’ (*The Toronto Star*, 2016). Because Atkinson had such a strong impact on *The Toronto Star*, the newspaper continues to remain politically independent.
4. These articles often question aspects of Bill C-51, but agree with or do not question the basic premise underpinning the bill.
5. Mirowski (2009) notes the difficulties in defining neoliberalism and highlights the contradictions within neoliberalism including the notion that

a strong state can just as easily thwart their program as implement it; hence, they are inclined to explore new formats of techno-managerial governance that protect their ideal market from what they perceive as unwarranted political interference. (p. 436)

The Conservative government sought a strong grasp of the power to 'protect their ideal market' because they are a conservative government in a neoliberal system.

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