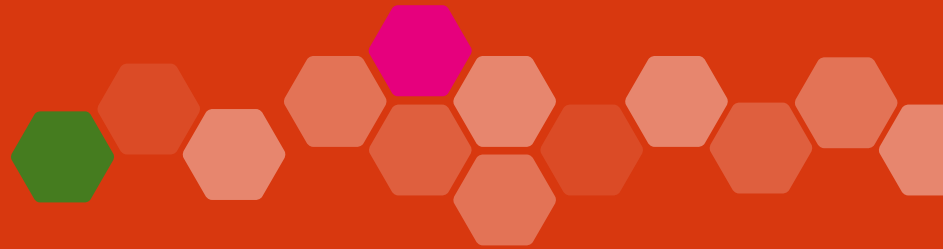


# Understanding extremism in Scotland: Review of definitions and terminology



**PEOPLE, COMMUNITIES AND PLACES**

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# 1. Introduction

This report reviews definitions of extremism used by governments in countries other than Scotland. This section provides an overview of the background to this review and outlines the research aims and questions.

## 1.1. Background and aims

### Prevent policy

The purpose of Prevent is to ‘stop people becoming terrorists or supporting terrorism’ (Home Office, 2018). While counter-terrorism (and therefore Prevent) is a reserved matter and the responsibility of the UK Government, the Counter-Terrorism and Security Act (2015) places a duty on sectors that are devolved from Westminster to the Scottish Government (including local authorities, health and social care, education, prisons, and the police) to pay ‘due regard to the need to prevent people from being drawn into terrorism’. This is known as the Prevent duty.

The Prevent duty guidance for Scotland (Home Office, 2021a) outlines how specified authorities are expected to comply with this duty. There is sector-specific guidance for further education institutions (Home Office, 2021b) and higher education institutions (Home Office, 2021c).

The Scottish Government supports the specified sectors to fulfil their obligations under the Prevent duty (Home Office, 2021a), and ensures that mechanisms are in place for safeguarding and supporting individuals who may be susceptible to being drawn into terrorism as outlined in the Prevent Multi-Agency Panel (PMAP) Duty Guidance<sup>1</sup> (Home Office, 2021d).

In Scotland, the approach taken to Prevent is tailored to the Scottish context and the specific challenges faced by Scottish communities. Emphasis is placed on early intervention, safeguarding, and the prevention of people from becoming alienated or isolated, with the aim of reducing vulnerability and increasing resilience to extremist narratives.

### Defining extremism

The UK Government currently adopts the following definition of extremism:

‘vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas’. (Home Office, 2011: 107)

This definition was used in the UK Government’s Counter-Extremism Strategy (Home Office, 2015), which set out the UK Government’s approach to countering

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<sup>1</sup> PMAPs are a key part of Prevent and involve using a multi-agency approach to assess the nature and extent of an individual’s vulnerability and develop an appropriate support plan.

‘both violent and non-violent’ extremism. However, as counter-extremism is a devolved matter, the Counter-Extremism Strategy, and UK Government definition of extremism, were not adopted in Scotland.

At present, therefore, the Scottish Government does not have an official definition of extremism. An evidence review carried out by Scottish Government researchers highlighted challenges with defining extremism (Scottish Government, 2023). For example, key difficulties include that:

- Various factors, such as the prevailing political culture, value systems and personal characteristics and experiences, influence how the term is understood, meaning it is an inherently relative and ambiguous term (Sotlar, 2004).
- Extremism is often conceptualised as a continuum of beliefs and behaviours, which makes it difficult to capture in a definition (Wilkinson and van Rij, 2019).
- Defining extremism too broadly can risk impeding rights to free speech and protest, while defining it too narrowly can lead to potentially extremist behaviours being overlooked (Redgrave et al., 2020).

Challenges such as these have meant that while a range of definitions of extremism have been proposed, there is a general lack of consensus on how the term should be defined in the literature (Bötticher, 2017; Lowe, 2017; Nasser-Eddine et al., 2013; Redgrave et al., 2020; Saija et al., 2021; Schmid, 2013).

A key recommendation from the evidence review was that the Scottish Government should review how governments in other countries define extremism, which is the aim of this report.

## **1.2. Research questions**

The review sought to answer the following questions:

1. How is ‘extremism’ defined by governments in other countries, and what can be learnt from these definitions?
2. What terminology is used by governments in other countries to describe particular types of extremism, and what can be learnt from these approaches?

## **1.3. Methodology**

To address these questions, a review of approaches to defining extremism which are used by governments in other countries was undertaken. To ensure that the definitions chosen were relevant and informative, a decision was made to focus on countries with:

- an official definition of extremism;

- a definition of extremism which is publicly available;
- a definition of extremism available in English;
- a comparable level of socioeconomic development to Scotland and the wider UK;
- a tradition of democratic governance.

These criteria led to the identification of the following 13 countries for inclusion in the review:

- Australia
- Austria
- Canada
- Czech Republic
- Denmark
- Finland
- Germany
- New Zealand
- Norway
- Slovakia
- Sweden
- The United Kingdom
- The United States

The review process involved identifying, collating and summarising publicly available material about the definitions used by the governments<sup>2</sup> in each of these countries. Key sources typically included government websites, legislation, and policy documents and strategies, particularly those related to the prevention of extremism and terrorism.

Notably, while this report covers a range of definitions of extremism, it should not be regarded as a comprehensive or definitive account of all definitions that exist or which are adopted outside of Scotland; rather, it constitutes a summary of the definitions used by governments in the countries which met the above inclusion criteria. The definitions covered were used by the governments when this report was written (in 2022), but it is possible that they may have been amended or updated since this time.

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<sup>2</sup> In addition to reviewing the UK Governments definition of extremism, the review also considered a definition of 'hateful extremism' developed by the Commission for Countering Extremism (CCE), a non-statutory expert committee of the Home Office which was established by the UK Government in 2018.

## **1.4. Report structure**

The next section describes how extremism is defined by the governments in each of the above countries in turn. This is followed by a discussion of the key findings of the review and recommendations.

## 2. Review of definitions

### 2.1. Australia

The Australian Government's definition of extremism is included in Australia's Counter-Terrorism Strategy (Australian Government, 2022), which sits above and is complemented by Australia's National Counter-Terrorism Plan (Australia-New Zealand Counter-Terrorism Committee, 2017). The strategy sets out three key objectives:

1. countering violent extremism in all its forms by preventing radicalisation of individuals before an attack takes place, and rehabilitating and reintegrating violent extremist offenders;
2. equipping law enforcement, security intelligence and other operational agencies with the resources and powers to tackle terrorist threats;
3. ensuring that counter-terrorism arrangements are resilient, collaborative, consistent and proportionate both nationally and internationally.

The focus of the strategy is on 'violent extremism', which is defined as:

'a willingness to use unlawful violence, or support the use of violence by others, to promote a political, ideological or religious goal. It includes terrorism, other forms of politically motivated violence and some forms of communal violence, such as racially motivated violence' (p9).

Further to this definition, the Australian Government (2022) also uses two overarching descriptors for violent extremism: ideologically-motivated violent extremism (IMVE) and religiously-motivated violent extremism (RMVE).

In 2021 the Australian Security Intelligence Organisation (ASIO), Australia's national security agency, defined these terms. They stated that IMVE denotes support for violence to achieve political outcomes, or in response to a specific political or social grievance, with motivations including nationalism, racism, anarchism, or other specific issues (ASIO, 2021). In contrast, RMVE denotes support for violence to oppose or achieve a specific social, political or legal system based on a religious interpretation. Australia's Counter-Terrorism Strategy (Australian Government, 2022: 8) states that 'Islamic State of Iraq and Levant (ISIL), Al Qa'ida and associated groups remain the most significant RMVE threat', but highlights that 'these groups are motivated by a selective, violent and extreme interpretation of Islam not shared by the vast majority of Muslims'.

The ASIO (2021) outline that the terms IMVE and RMVE were adopted due to a view that previous labels were no longer fit for purpose. In particular, they contend that when considering violent groups that subscribe to political ideologies, terms such as 'extreme left wing' and 'extreme right wing' distract from the real nature of the threat, as the ASIO does not investigate people solely because of their political views. Further, they suggest that a growing number of individuals and groups don't

fit on the left-right spectrum at all, but are instead motivated by a fear of societal collapse or a specific social or economic grievance or conspiracy, such as those who adhere to the incel movement<sup>3</sup>.

Similarly, the ASIO (2021) state the term RMVE was adopted to reflect the fact that the ASIO do not investigate people because of their religious views. Rather, it is the use or endorsement of violence that is their central focus, which is not clear when terms such as 'Islamic extremism' are used. The ASIO (2021) also note that Muslim groups view this term as damaging and misrepresentative of Islam.

The ASIO (2021) highlight that the categories IMVE and RMVE are umbrella terms, and that there may be circumstances where it is necessary to identify specific threats that sit underneath these. However, they state that this approach more accurately and flexibly describes current security-relevant activities taking place in Australia, with the evolving language reflecting the evolving threat environment.

## 2.2. Austria

The Austrian definition of extremism is included in the Austrian Strategy for the Prevention and Countering of Violent Extremism and De-radicalisation (Bundesweites Netzwerk Extremismusprävention und Deradikalisierung (BNED), 2018). The strategy presents principles and guidelines for those working in the prevention of violent extremism and de-radicalisation in Austria. Extremism is defined in the strategy as follows:

'The term extremism derives from the Latin word "extremus" meaning "utmost". "Extremism", thus, describes a political, religious or ideological attitude which has arrived at its "utmost" form. The aim is to completely change the classification system of a society. In order to achieve this goal, the use of violence and force is a legitimate tool in extremism' (p20).

Definitions of radicalisation and terrorism are also provided:

'Radicalisation is the process of individual, cognitive and behaviour-based adaptation to a political, religious or any other ideological world view aiming at bringing about fundamental changes in the classification system of a society. Radicalisation does not inevitably result in the use of violence and violation of the law. In a democratic state based on the rule of law, the mere conviction about a radical idea per se is not criminally relevant. Extremism often comes in when violence is used to push through an individual conviction' (p20).

'The term "terrorist act" refers to one of the intentional acts listed below, which, given their nature or context, may seriously damage a country or an

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<sup>3</sup> The incel community is comprised of individuals who feel rejected by women – and arguably society more generally – and turn to the Internet to voice their anger, and often, desire for revenge (Regehr, 2022).



international organisation and is defined as a criminal act according to national law, if it is committed with the aim:

- I. of seriously intimidating a population or
- II. unduly compelling a government or an international organisation to perform or abstain from performing an act or
- III. seriously destabilising or destroying the fundamental political, constitutional, economic or social structures of a country or an international organisation' (p20).

The strategy does not specify particular forms of extremism or seek to define these, beyond noting that extremism is typically motivated by political, religious or ideological attitudes. It is stated that by avoiding this, 'it is made it clear that it is essential not to focus on individual forms of extremism when implementing prevention and de-radicalisation measures, but to always keep an eye on extremism in all its various manifestations'.

However, it is notable that following a terrorist attack in Vienna in November 2020, the Austrian Government (2022) submitted changes to Parliament to adapt the existing legal framework for combatting terrorism in Austria. Among other changes, this included the criminalisation of participation in 'religiously motivated extremist associations', defined as associations which 'continually attempt to replace, in an unlawful manner, the essential elements of the democratic constitutional order of the Republic with a social and state order based exclusively on religion, by preventing the enforcement of laws, ordinances or other state decisions, or by arrogating to itself sovereign rights based on religion or attempting to enforce such rights' (p6).

### **2.3. Canada**

The Canadian Security Intelligence Service (CSIS), which is responsible for conducting operations and collecting, analysing, reporting and disseminating intelligence on threats to Canada's national security, publishes annual reports<sup>4</sup>. In the 2019 report, the CSIS (2019) announced that they had adopted new terminology in relation to extremism, linked with the CSIS Act (Canadian Government, 2019) and Section 83 of the Criminal Code of Canada (Canadian Government, 2022).

While no definition of 'extremism' in its broadest sense was outlined in this report, three main categories of extremist threat were identified: religiously-motivated violent extremism (RMVE), politically-motivated violent extremism (PMVE) and ideologically-motivated violent extremism (IMVE). RMVE was defined as encouraging the use of violence as part of a spiritual struggle against a perceived immoral system, with followers believing that 'success or salvation can only be achieved through violence', while PMVE was defined as encouraging the use of violence 'to establish new political systems, or new structures and norms within existing systems' (p11). The report states that proponents of IMVE are driven by a

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<sup>4</sup> [CSIS Publications](#)

range of ideas and influences rather than a singular belief system. Four main categories of IMVE are outlined, including:

1. **Xenophobic violence:** defined as ‘the fear or hatred of what is perceived to be foreign, different or strange, which leads to racially-motivated violence’ (traditionally referred to in the Canadian context as ‘white supremacy’ or ‘neo-Nazism’).
2. **Anti-authority violence:** defined as ‘as the opposition to, or rejection of, the authority of the State which leads to anti-Government and violence against law enforcement’ (e.g., anarchist violence, law enforcement violence).
3. **Gender-driven violence:** defined as ‘the hatred of those of a different gender and or sexual orientation which can lead to violent misogyny’ (e.g., violent misogyny, incel, anti-LGBTQ violence).
4. **Other grievance-driven and ideologically-motivated violence:** defined as ‘ideologically-motivated violent extremists who act without a clear affiliation to an organised group or external guidance, but ‘are nevertheless shaped by the echo chambers of online hate that normalise and advocate violence’.

The CSIS report states that because proponents of this form of violent extremism often act without clear affiliation to a specific organised group or external guidance, and can have diverse combinations of worldviews and goals, the use of such terms as ‘right-wing’ and ‘left-wing’ to describe them is not only subjective, but inaccurate in capturing the complexity of their motivations.

The report contends that by avoiding defining the threat by specific religious affiliations or by where someone sits on the political spectrum through the use of the above categories, this approach destigmatises the way the concept is viewed, by demonstrating that violent extremism can come from many different motivations and is not specific to any single community, race, or religion.

## 2.4. Czech Republic

The Czech definition of extremism is included in the most recent ‘Report on Extremism and Prejudicial Hatred in the Territory of the Czech Republic in 2020’ (Ministry of the Interior Security Policy Department, 2021). Released annually, this report aims to provide an update on the threat picture in the Czech Republic, including summarising the risks posed by particular extremist groups, as well as providing an overview of statistics on criminal activity motivated by hatred.

In the report, extremism is said to refer to ‘distinct ideological positions that deviate from constitutional and legal norms, are characterised by elements of intolerance, and attack the basic democratic constitutional principles as defined in the Czech constitutional order’ (p4). The principles include:

- respect for human and civil rights and freedoms
- a sovereign, unitary and democratic state governed by the rule of law

- the immutability of the essential elements of a democratic state governed by the rule of law
- the sovereignty of the people
- free competition between political parties respecting fundamental democratic principles and rejecting violence as a mean of asserting their interests
- the protection of minorities in the decision-making of the majority
- the freedom and equality of people in dignity and rights, the inherence, inalienability, illimitability and irreparability of fundamental rights and freedoms without distinction of sex, race, colour of skin, language, faith, and religion, political or other conviction, national or social origin, membership of a nationality or ethnic minority, property, birth, or other status

It is stated that ‘extremist attitudes can develop into activities that have a destructive effect, either directly or in the long term, on the existing democratic political-economic system, i.e., they seek to replace the democratic system with a non-democratic one (totalitarian or authoritarian regime, dictatorship, anarchy)’ (p5). Extremists are said to typically tactics such as: historical revisionism, social demagogy, activism, the promotion of verbal to physical violence against opponents and against *a priori* defined social groups, and conspiracy theories.

The key types of extremism noted as being of concern in the Czech Republic include left-wing extremism, right-wing extremism, religiously-motivated extremism, ecological extremism and nationalist extremism. However, it is stated that religiously-motivated, ecological and nationalist forms of extremism occur only sporadically in the Czech Republic, so the report is more focused on right-wing extremists (inspired by and using primarily national, racial, and ethnic resentment, sympathising with historical fascism or Nazism) and left-wing extremists (motivated primarily by social, class and anti-cultural resentment, sympathising with historical communism or anarchism).

In addition to the concept of extremism, the report uses the concept of ‘prejudicial hatred’, to ‘respond to the fact that the influence of traditional extremist entities is weakening, and their rhetoric and activities are gradually being taken over by other entities that cannot be unequivocally described as extremist’ (p6). Manifestations of prejudicial hatred are said to refer to behaviour (such as physical violence, verbal attacks or the use of offensive symbols) that is motivated by intolerance and social biases against particular groups, including those of a particular race, nationality, ethnicity, religion, sexual orientation, etc. The report states that manifestations of prejudicial hatred differ from extremism because they do not have to be associated with a particular ideology or movement, and also lack a clear call to overthrow democracy. However, it is stated that the risks of manifestations of prejudicial hatred are similar to the dangers posed by extremists, e.g., they:

- Do not seek the immediate destruction of the democratic system but gradually weaken it.
- Do not respect the concept of fundamental human rights.
- Incite others to hate activities.

- Spread fear in society.
- Fragmentise society causing antagonisms.
- Downplay the fate of victims of totalitarian regimes and victims of hate crime.
- Use disinformation and conspiracy theories to communicate with the public.
- Become an instrument of influence for countries and groups that do not respect the principles of pluralist democracy.

## 2.5. Denmark

Denmark's National Action Plan for Preventing and Countering Extremism and Radicalisation was published in 2016 (Danish Government, 2016). This plan described existing measures in place to prevent extremism and radicalisation in Denmark and also established new initiatives, including: enhanced policing efforts, countering propaganda and preventing online radicalisation, addressing foreign fighters and returnees, targeted criminal intervention programs, preventing radicalisation in prisons, day-care and school programming, and strengthening outreach to local communities.

In the plan, extremism is defined as 'persons or groups that commit or seek to legitimise violence or other illegal acts, with reference to societal conditions that they disagree with' (p7). It is stated that extremism covers e.g., left-wing extremism, right-wing extremism and militant Islamism. Radicalisation is also defined, as 'a short- or long-term process where persons subscribe to extremist views or legitimise their actions on the basis of extremist ideologies' (p7). Preventing extremism and radicalisation is presented primarily as a way to deter terrorism, but is said to also have wider welfare-related implications for society, such as better cohesion and integration.

## 2.6. Finland

Finland's definition of violent extremism is set out in the 'National Action Plan for the Prevention of Violent Radicalisation and Extremism 2019-2023' (Ministry of the Interior, Finland, 2019). This is the third iteration of the Finnish National Action Plan for the Prevention of Violent Radicalisation and Extremism, with the first published in 2012 and the second in 2016.

The plan sets out:

- The situation concerning violent extremism in Finland and Europe
- Finland's strategy for the prevention of violent radicalisation and extremism
- Parties participating in the implementation of the Action Plan, their duties in prevention and the organisation of activities
- Objectives and measures of the Action Plan
- Tools for monitoring and reporting

In the plan, 'violent extremism' is the focus, which is defined as 'using, threatening with, instigating, encouraging or justifying violence based on ideological grounds'

(p20). The plan states that violent extremism is often targeted at a group or individuals defined as enemies, and causes fear and a sense of insecurity. It is noted that crime motivated by hate and/or racism can also be extremist when it is motivated by an ideology.

The plan states that terrorism is always a form of violent extremism, but not all violent extremism is terrorism. Terrorism is characterised as more subversive and typically targeted at countries or international organisations, with its purpose to cause serious fear among the population.

‘Violent radicalisation’ is also defined in the plan, as ‘a process through which individuals end up using or threatening the use of violence, urging someone to commit acts of violence or justifying it on ideological grounds’ (p20). Meanwhile, ‘ideology’ is defined as ‘a worldview that is common to a specific group of people and stems from attitudes about groups of people, the world, religion, relations between people and states, human dignity, what is sacred and what is profane as well as corresponding beliefs that constitute a moral compass for an individual’ (p21).

Finally, an ‘extremist offence’ is defined as ‘crime motivated by the ideology of the person committing it’ (p21). A distinction is drawn between hate crime and extremist crime, with the former said to be connected with a specific characteristic of the victim, while the latter said to be motivated by an entire ideology.

The plan states that ‘the prevention of national violent extremism and radicalisation targets all forms of violent extremism in Finland that use violence and instigate or encourage the use of violence in order to achieve their goals’ (p23). This covers: the violent non-parliamentary far right, the violent non-parliamentary far left, religiously-motivated violent extremism, radical alternative or environmental movements. In addition, ‘individual actors’ are also considered to pose a threat, with the plan stating that these actors may be motivated by any of the above ideologies, but also may not be attached to any particular ideology.

## **2.7. Germany**

The German Federal Ministry of the Interior and Community (2022) defines ‘extremist activities’ as ‘those which oppose our democratic constitutional state and its fundamental values, norms and rules, and aim to overthrow the liberal democratic order and replace it with one in line with the ideas of the respective group’. It is stated that extremists ‘often accept, promote and actually use violent means to achieve their goals’, and that ‘activities which use or prepare to use violence to endanger foreign interests of the Federal Republic of Germany or the idea of international understanding, in particular peaceful co-existence, are also considered extremist’.

Further, extremists are said to ‘oppose the basic and human rights described in the Basic Law, such as the right of free expression’, and ‘fundamental principles of democracy, such as the sovereignty of the people and the independence of the courts’. A contrast is made between extremists and ‘radical groups’, who are said to

want to 'get at the root of social problems and conflicts without harming the democratic order or rule of law'.

The German approach to preventing extremism is set out in the Federal Government Strategy to Prevent Extremism and Promote Democracy (Federal Government, Germany, 2016). The strategy sets out six 'action areas': political education, intercultural learning and democracy work; participation in civil society; counselling, monitoring and intervention; media and internet; research; and international cooperation. In this strategy, the 'prevention of extremism' is defined as covering:

'measures to prevent and combat a rejection of the system of values of the Basic Law and the democratic constitutional state and also, in this context, to safeguard the security of citizens. Preventive measures are targeted at people or groups at risk, their environment and their networks and also, if necessary, at potential perpetrators in order to prevent the consolidation of problematic thought patterns and to break the transition from thoughts to (violent) action. Prevention also includes measures to counter any reappearance of manifest phenomena and to hinder the repetition of violent actions and other criminal activities' (p9).

The main forms of extremism identified in the strategy include: right-wing extremism, left-wing extremism (and relatedly left-wing militancy), Islamist extremism (described as misuse of religion for anti-democratic purposes), Islamophobia and hatred of Muslims, antisemitism, antiziganism (or hostility towards Sinti and Roma people), homophobia and transphobia.

## **2.8. New Zealand**

New Zealand's definition of extremism is set out in New Zealand's Counter-Terrorism and Violent Extremism Strategy (New Zealand Government, 2021). The most recent iteration of this strategy was published in 2021, and set out four priority areas for protecting New Zealanders from terrorism and violent extremism, including:

1. Reduction: identifying and analysing long-term risks and taking steps to eliminate these risks if practicable, or if not, to reduce their likelihood and the magnitude of their impact.
2. Readiness: developing operational systems and capabilities before an emergency happens.
3. Response: taking action immediately before, during or directly after a significant event.
4. Recovery: using coordinated efforts and processes to bring about immediate, medium-term, and long-term regeneration.

In the strategy, a distinction is drawn between extremism and violent extremism. 'Extremism' is defined as:



‘Religious, social or political belief systems that exist substantially outside of more broadly accepted belief systems in large parts of society, and are often seen as objectionable to large parts of society. Extreme ideologies may seek radical changes in the nature of government, religion or society or to create a community based on their ideology’ (p7).

‘Violent extremism’ is defined as:

‘The justification of violence with the aim of radically changing the nature of government, religion or society. This violence is often targeted against groups seen as threatening violent extremists’ success or survival, or undermining their world view’ (p7).

A definition of terrorism is also provided:

‘Under New Zealand law, a terrorist act is defined as an ideologically, politically, or religiously motivated act – including, but not limited to, those causing death or serious bodily injury – intended to intimidate a population, or to compel the government to do or not do certain things’ (p7).

In 2021, the New Zealand Security Intelligence Service (NZSIS) announced that they had adopted additional terminology in relation to extremism, to complement existing definitions (NZSIS, 2021a). Adapted from the Canadian approach, the NZSIS (2021b) adopted a framework comprising four main types of violent extremism:

1. **Identity-motivated violent extremism:** covering promotion of the use of violence to advance one’s own perception of identity and/or denigrate others’ perceived identities.
2. **Faith-motivated violent extremism:** covering promotion of the use of violence to advance one’s own spiritual or religious objectives.
3. **Politically-motivated violent extremism:** covering promotion of the use of violence to achieve change within an existing political system.
4. **Single-issue motivated violent extremism:** covering promotion of the use of violence to achieve a specific outcome related to a single issue (e.g., climate change, anti-abortion, animal rights and anti-vax).

The NZSIS (2021a) stated that the aim of this change of language was to enable greater awareness of the increasingly diverse spectrum of ideologies that currently exist, while also making clear that the concern in New Zealand is with violent extremists and terrorists of varying ideologies – threats that ‘should not be conflated with communities’. They suggest that the ideologies can be used in conjunction with each other to capture individuals or groups with overlapping ideological motivations.

## 2.9. Norway

Norway’s second (and latest) ‘Action plan against Radicalisation and Violent Extremism’ was published in 2014 (Norwegian Ministry of Justice and Public

Security, 2014). The plan sets out a framework for combatting radicalisation and violent extremism in Norway, outlining five 'prioritised areas' for effort in this field, including:

1. Knowledge and expertise
2. Cooperation and coordination
3. Preventing the growth of extremist groups and helping to promote reintegration
4. Preventing radicalisation and recruitment through the Internet
5. International cooperation

A range of measures are set out under each prioritised area, which were enacted when the plan was published. In the plan, the term 'violent extremism' is used, which is defined as:

'activities of persons and groups that are willing to use violence in order to achieve their political, ideological or religious goals' (p7).

A definition of radicalisation is also provided:

'Radicalisation is understood here to be a process whereby a person increasingly accepts the use of violence to achieve political, ideological or religious goals. A process of radicalisation that results in violent extremism is characterised by:

A cognitive development toward a steadily more unilateral perception of reality, where there is no room for alternative perspectives.

Thereafter, a further development where the perception of reality is experienced so acutely and seriously that violent actions appear necessary and just' (p7).

What separates radicalisation from violent extremism in the Norwegian context is therefore the move from accepting the use of violence to acting in a violent manner. Terrorism is then presented as 'the most extreme consequence of radicalisation and violent extremism'.

Finally, a definition of hate crime is also outlined:

'Hate crime is understood here to mean criminal acts that are fully or partially motivated by negative attitudes to a person or group's actual or perceived ethnicity, religion, political affiliation, sexual orientation, gender expression or disability. Violent extremism is the most extreme form of hate crime' (p7).

Particular forms of violent extremism are not defined in the plan, but it is stated that 'there are two dominant opposing violent extremist groups in Norway today: Al-Qa'ida-inspired extremists and right-wing extremists who are hostile to Islam'. Al



Qa'ida-inspired extremists are said to 'promote hate and violent rhetoric aimed at the western world and especially at Norway and Norwegian interests and symbols', while right-wing extremists are said to 'defend a view of the world that is hostile to Islam or immigration' (p10).

## **2.10. Slovakia**

In 2020, the Crime Prevention Department of the Office of the Minister of Interior of the Slovak Republic published 'The Conceptual Framework for Countering Radicalisation and Extremism by 2024' (Crime Prevention Department of the Office of the Minister of Interior of the Slovak Republic, 2020). This document set out priorities for Slovakia in the area of preventing and countering radicalisation and extremism, building on a previous framework which covered the period 2015-2019.

It is stated that the fundamental goal of the framework is to 'defend and protect democratic rule of law, its basic values and attributes and to call for the creation of a strong democratic and political environment rejecting any manifestations of extremism or hate speech based on the grounds of national, racial, ethnic, religious or other intolerances' (p8). Four key aims are set out:

1. To ensure the protection of the foundations of the democratic rule of law and its values, including the safety of the population from actions of individuals or movements advocating extremist ideologies
2. To strengthen the democratic culture in society by raising awareness about human rights and breaking down negative stereotypes
3. To restore the trust in public institutions and encourage reporting of unlawful activities
4. To promote de-radicalisation, social integration and social prevention

Extremism is defined in the framework as 'manifestations and acts based on attitudes rising from an extreme ideology, which is in conflict with ideas of the democratic rule of law' (p9). It is stated that in order to promote ideological goals, extremists conduct 'deliberate verbal or physical actions against the main attributes of the existing democratic system' (p9). The characteristic features of extremism are said to include: 'attacks on the system of fundamental rights and freedoms guaranteed by the Constitution and international human rights documents, as well as attempts to limit, suppress, or prevent the exercise of fundamental rights and freedoms for certain groups of people defined by their real or perceived belonging to a race, nation, nationality, ethnic group; or by their real or perceived origin, skin colour, sex, sexual orientation, political or religious beliefs' (p9). The framework identifies four main types of extremism: right-wing extremism, left-wing extremism, religious extremism and single-issue extremism.

Radicalisation is also defined, as 'a process of growing acceptance of an ideology, which is contrary to the democratic rule of law' (p9). During this process, individuals or groups under the influence of some form of political or religious extremism are said to 'acquire a new system of values which are incompatible with the democratic

rule of law, denying equality before the law and human dignity'. This can take on violent forms, and in some cases can lead to terrorism. A definition of terrorism is also presented:

'Terrorism can be defined as the deliberate and systematic use of acts of violence, which, by their nature or context, could seriously damage a country, or an international organisation where committed with the aim of seriously intimidating a population; or unduly compelling a government or international organisation to perform or abstain from performing any act; or seriously destabilising or destroying the fundamental political, constitutional, economic or social structures of a country or an international organisation' (p1).

The framework states that terrorism is one of the most serious violations of the universal values of human dignity, freedom, equality, solidarity and the applicability of fundamental human rights and freedoms, and one of the most serious attacks on democracy. It can be the act of an individual, a group of individuals or an organised group, but may also be an act of state power against its own population or related to an international armed conflict against the civilian population of an enemy state.

## **2.11. Sweden**

In 2015, the Swedish Government published 'Actions to Make Society More Resilient to Violent Extremism' (Swedish Government, 2015). This document provided an account of measures the Swedish Government had implemented to safeguard democracy against violent extremism, and aimed to 'improve knowledge of violent extremism and develop preventive initiatives and methods', enabling 'authorities, municipalities and civil society organisations, including faith communities, to contribute in a more coordinated and effective manner to safeguard democracy against violent extremism' (p22).

The measures were focused on five key areas:

1. National coordination to safeguard democracy against violent extremism
2. Measures to safeguard democracy and the equal value and rights of all people
3. Measures against identified risks
4. Measures to encourage individuals to leave violent extremist movements
5. Strengthened Nordic and international sharing of knowledge and experience

In the document, the Swedish Government defines 'violent extremism' as 'ideologies that accept and legitimise violence as a means by which to realise extreme ideological opinions and ideas' (p9). Radicalisation is also defined, as a process where an individual has 'gradually come to adopt a violent ideology or accept violence as a legitimate method within the scope of a political or religious ideology' (p16).

The document states that violent extremism in Sweden consists primarily of three identified groups: right-wing extremism, left-wing extremism and Islamist extremism, the activities of which ‘undermine, challenge and threaten democracy in different ways’ (p4). In particular, people who are involved in right-wing extremism are said to commit crimes that have ‘racist Islamophobic, antiziganistic, anti-Semitic, afrophobic, homophobic and transphobic undertones’, while people who are involved in left-wing extremism are said to ‘subject democratically elected representatives, civil servants and people in the right-wing extremist movement, for example, to harassment, threats and violence’. In relation to Islamist extremism, it is stated that it is ‘particularly worrying that an increased number of people have committed themselves to violent Islamist extremism and armed extremist and terrorist groups in Syria and Iraq’.

## **2.12. The United Kingdom**

The UK Government defines extremism as ‘vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs’ (Home Office, 2011). This definition was developed following a review of Prevent by the Coalition Government in 2011, but has been subject to criticism. For example, some have argued that terms used within the definition are unclear, such as the phrases ‘fundamental British values’ and ‘the rule of law’, while it has also been suggested that the wide scope of the definition potentially criminalises legitimate political opposition and institutional critique (Lowe, 2017; Elliot and Thomas, 2012; Mythen et al., 2017).

In 2019 the Commission for Countering Extremism (CCE) (a non-statutory expert committee of the Home Office) undertook a review of the UK Government's Counter-Extremism Strategy and definition. The CCE's (2019) report, *Challenging Hateful Extremism*, identified a new category of extremist activity described as ‘hateful extremism’. This was defined as:

‘Behaviours that can incite and amplify hate, or engage in persistent hatred, or equivocate about and make the moral case for violence; that draw on hateful, hostile or supremacist beliefs directed at an out-group [a group with which an individual does not identify] who are perceived as a threat to the wellbeing, survival or success of an in-group [a group that a person identifies as being a part of]; and that cause, or are likely to cause, harm to individuals, communities or wider society’ (p10).

In 2021, the CCE (2021) refined this definition further, describing hateful extremism as:

‘Activity or materials directed at an out-group who are perceived as a threat to an in-group motivated by or intending to advance a political, religious or racial supremacist ideology:

a. To create a climate conducive to hate crime, terrorism or other violence; or

b. Attempt to erode or destroy the fundamental rights and freedoms of our democratic society as protected under Article 17 of Schedule 1 to the Human Rights Act 1998' (p12).

The CCE contended that in the absence of legislation to address hateful extremism, many 'hateful extremists' are able to operate lawfully, which is creating a climate conducive to hate crime, terrorism and other violence in the UK. They recommended that the UK Government should:

1. Commission a legal and operational framework to robustly counter the hateful extremism threat.
2. Expand current offences relating to stirring up hatred and strengthen current resources and capability of law enforcement agencies.
3. Elevate hateful extremism to be a priority threat alongside terrorism and online child exploitation.

### **2.13. The United States**

In the United States, a key distinction made is that between 'international' and 'domestic' terrorism. International terrorism is defined as involving 'violent, criminal acts committed by individuals and/or groups who are inspired by, or associated with, designated foreign terrorist organisations or nations (state-sponsored)', whereas domestic terrorism is defined as involving 'violent, criminal acts committed by individuals and/or groups to further ideological goals stemming from domestic influences, such as those of a political, religious, social, racial, or environmental nature' (Federal Bureau of Investigation (FBI), 2022).

Terminology around extremism is set out in the most recently published Strategic Intelligence Assessment and Data on Domestic Terrorism, produced by the FBI and Department of Homeland Security (DHS), in consultation with the Director of National Intelligence (DNI) (2021). This report provides a strategic intelligence assessment on domestic terrorism, a discussion of procedures and methods to address domestic terrorism threats, as well as data on domestic terrorism incidents and investigations.

The focus within the assessment is on 'domestic violent extremism' (DVE), with a 'domestic violent extremist' defined as:

'an individual based and operating primarily within the United States or its territories without direction or inspiration from a foreign terrorist group or other foreign power who seeks to further political or social goals wholly or in part through unlawful acts of force or violence. The mere advocacy of political or social positions, political activism, use of strong rhetoric, or generalised philosophic embrace of violent tactics may not constitute extremism, and may be constitutionally protected' (p2).

While the term 'violent extremism' is used, it is notable that the definition states that 'generalised philosophic embrace of violent tactics may not constitute extremism',

and elsewhere the FBI and DHS (2020: 2) have emphasised that ‘the mere advocacy of ideological positions and/or the use of strong rhetoric does not constitute violent extremism, and in some cases direct or specific threats of violence must be present to constitute a violation of federal law’.

Further to this overarching definition, the FBI and DHS (2021: 15-16) also outline a range of types of extremism, though acknowledge that motivations can vary, are nuanced, and sometimes derived from a blend of ideologies. The ‘threat categories’ include:

1. **Racially- or ethnically-motivated violent extremism:** the potentially unlawful use or threat of force or violence in furtherance of ideological agendas derived from bias, often related to race or ethnicity, held by the actor against others or a given population group. Racially- or ethnically motivated violent extremists purport to use both political and religious justifications to support their racially- or ethnically-based ideological objectives and criminal activities.
2. **Anti-government or anti-authority violent extremism:** the potentially unlawful use or threat of force or violence in furtherance of ideological agendas, derived from anti-government or anti-authority sentiment, including opposition to perceived economic, social, or racial hierarchies, or perceived government overreach, negligence, or illegitimacy.
3. **Animal rights/environmental violent extremism:** the potentially unlawful use or threat of force or violence in furtherance of ideological agendas by those seeking to end or mitigate perceived cruelty, harm, or exploitation of animals and/or the perceived exploitation or destruction of natural resources and the environment.
4. **Abortion-related violent extremism:** the potentially unlawful use or threat of force or violence in furtherance of ideological agendas relating to abortion, including individuals who advocate for violence in support of either pro-life or pro-choice beliefs.
5. **All other domestic terrorism threats:** the potentially unlawful use or threat of force or violence in furtherance of ideological agendas which are not otherwise defined under or primarily motivated by one of the other Domestic Terrorism threat categories. Such agendas could flow from, but are not limited to, a combination of personal grievances and beliefs, including those described in the other Domestic Terrorism threat categories. Some actors in this category may also carry bias related to religion, gender, or sexual orientation.

## 3. Conclusion

The aim of this review was to explore how extremism is defined by governments in countries other than Scotland. This section will discuss the key findings of the review and recommendations for next steps.

### 3.1. Summary of key findings

The first key finding is that although a range of different definitions of extremism are used in the countries that were selected, some similarities between these definitions can be identified. In particular, governments in over half of the countries (Australia, Canada, Finland, New Zealand, Norway, Sweden and the United States), focus on violent rather than non-violent extremism. Violent extremism is generally defined as extremism involving the use, encouragement or incitement of, or support for violence. Governments in other countries (e.g., Denmark and Slovakia) do not explicitly use the term 'violent extremism', but identify violence as a key means through which extremists typically seek to achieve their aims.

In the remaining countries (Austria, the Czech Republic and Germany), while violence is mentioned, the focus of the governments' definitions is more on how extremist activities oppose or challenge the principles, values and norms typically associated with a liberal, pluralist democracy, such as the sovereignty of the people, the rule of law, freedom of expression and tolerance. This approach is more in line with the current UK Government definition of extremism.

The second key finding is that governments in three of the countries identified (Canada, Australia and New Zealand) have a similar approach to defining 'violent extremism', which has recently been updated. In these countries, broad categories of types of extremism are the focus, rather than specific ideologies. The Australian Government (2022) use just two categories, religiously-motivated and ideologically- or identity-motivated violent extremism, while in Canada and New Zealand a third category, politically-motivated violent extremism, is also used (CSIS, 2019; NZSIS, 2021a). A fourth category is also used in New Zealand, single-issue motivated violent extremism (NZSIS, 2021a). This approach was adopted in Canada in 2019, while in New Zealand and Australia the approaches were adopted in 2021.

In each of these countries, a similar justification is presented for the use of this approach. In particular, it is stated that the aim of this terminology is to move away from associating extremism with particular religions or political views, in order to avoid using language that may be considered discriminatory or stigmatising. This approach is also said to capture a more diverse spectrum of ideologies than previously terminology was able to, and better able to accommodate groups outside of traditional categories, such as the incel movement.

Furthermore, countries that do not use an explicit categorisation approach use a similar split to that adopted in Canada, Australia and New Zealand. For example, in Austria and Norway extremism is noted as having political, ideological and religious motivations, while in the Czech Republic, Finland and Slovakia the term 'religiously-

motivated' is used. In Slovakia the 'single-issue' category used in New Zealand is also adopted.

## **3.2. Recommendations**

The previous evidence review carried out by the Scottish Government (2023) recommended that a programme of research be developed to address evidence gaps relating to the extent and nature of extremism in Scotland. The review suggested that it would be useful to explore understandings and perceptions of extremism from the perspective of key groups and communities, such as the public, practitioners working to deliver Prevent in Scotland, and stakeholders who have an interest in Prevent or extremism in Scotland.

It is further recommended that this work also seeks to capture views on the approaches to defining extremism used in other countries outlined in this report. In particular, it would be beneficial to explore how far existing definitions align with the understanding of these groups and communities, and to explore whether they feel that the categorisation approach adopted in Canada, Australia and New Zealand is a helpful way to approach defining extremism.



## 4. Bibliography

Australia New Zealand Counter-Terrorism Committee (2017) *National Counter-Terrorism Plan* (4<sup>th</sup> edition). Australia: Australian Government. Available at: [National Counter-Terrorism Plan](#).

Australian Government (2022) *Safeguarding Our Community Together Australia's Counter-Terrorism Strategy 2022*. Australia: Australian Government. Available at: [Safeguarding Our Community Together Australia's Counter-Terrorism Strategy 2022](#).

Australian Security Intelligence Organisation (2021) *Director-General's Annual Threat Assessment*. Available at: [Director-General's Annual Threat Assessment](#).

Austrian Government (2022) Reply of the Government of Austria to the information request of five Special Rapporteurs on the Austrian Anti-Terrorism Act (Terrorbekämpfungsgesetz TeBG). Available at: [Reply of the Government of Austria to the information request of five Special Rapporteurs on the Austrian Anti-Terrorism Act \(Terrorbekämpfungsgesetz TeBG\)](#).

Böttcher, A. (2017) 'Towards Academic Consensus Definitions of Radicalism and Extremism', *Perspectives on Terrorism*, 11(4), pp. 73-77.

Bundesweites Netzwerk Extremismusprävention und Deradikalisierung (2018) *The Austrian Strategy for the Prevention and Countering of Violent Extremism and De-radicalisation*. Austria: Bundesweites Netzwerk Extremismusprävention und Deradikalisierung. Available at: [The Austrian Strategy for the Prevention and Countering of Violent Extremism and De-radicalisation](#).

Canadian Government (2019a) *Canadian Security Intelligence Service Act*. Available at: [Canadian Security Intelligence Service Act](#).

Canadian Security Intelligence Service (2019b) *CSIS Public Report 2019*. Available at: [CSIS Public Report 2019](#).

Canadian Government (2022) *Criminal Code*. Available at: [Criminal Code](#).

Commission for Countering Extremism (2019) *Challenging Hateful Extremism*. Available at: [Challenging Hateful Extremism](#).

Commission for Countering Extremism (2021) *Operating with Impunity: Hateful extremism: The need for a legal framework*. Available at: [Operating with Impunity: Hateful extremism: The need for a legal framework](#).

*Counter-Terrorism and Security Act 2015*. Available at: [UK Government legislation \(CTSA\)](#).

Crime Prevention Department of the Office of the Minister of Interior of the Slovak Republic (2020) *The Conceptual Framework for Countering Radicalisation and*



*Extremism by 2024*. Slovakia: Minister of the Interior. Available at: [The Conceptual Framework for Countering Radicalisation and Extremism by 2024](#).

Danish Government (2016) *Preventing and Countering Extremism and Radicalisation: National Action Plan*. Denmark: Danish Government. Available at: [Preventing and Countering Extremism and Radicalisation: National Action Plan](#).

Elliot, M. and Thomas, R. (2012) *Public Law* (2nd ed.). Oxford: Oxford University Press.

Federal Bureau of Investigation (2022) *Terrorism*. Available at: [Terrorism](#).

Federal Government, Germany (2016) *Federal Government Strategy to Prevent Extremism and Promote Democracy*. Berlin: Federal Government. Available at: [Federal Government Strategy to Prevent Extremism and Promote Democracy](#).

Federal Bureau of Investigation and the Department of Homeland Security (2020) *Domestic Terrorism: Definitions, Terminology, and Methodology*. Available at: [Domestic Terrorism: Definitions, Terminology, and Methodology](#).

Federal Bureau of Investigation and the Department of Homeland Security (2021) *Strategic Intelligence Assessment and Data on Domestic Terrorism*. Available at: [Strategic Intelligence Assessment and Data on Domestic Terrorism](#).

Ford, K. (2017) 'Developing a Peace Perspective on Counter-Extremist Education', *Peace Review: A Journal of Social Justice*, 29(2), pp. 144-152.

German Federal Ministry of the Interior and Community (2022) *Extremism*. Available at: [Extremism](#).

Home Office (2011) *Prevent Strategy*. Norwich: TSO. Available at: [Prevent Strategy](#).

Home Office (2015) *Counter-Extremism Strategy*. London: Home Office. Available at: [Counter-Extremism Strategy](#).

Home Office (2018) *CONTEST: The United Kingdom's Strategy for Countering Terrorism*. UK: HM Government. Available at: [CONTEST: The United Kingdom's Strategy for Countering Terrorism](#).

Home Office (2021a) *Revised Prevent duty guidance: for Scotland*. UK: HM Government. Available at: [Revised Prevent duty guidance: for Scotland](#).

Home Office (2021b) *Prevent duty guidance: for further education institutions in Scotland*. Available at: [Prevent duty guidance: for further education institutions in Scotland](#).

Home Office (2021c) *Prevent duty guidance: for higher education institutions in Scotland*. Available at: [Prevent duty guidance: for higher education institutions in Scotland](#).

Home Office (2021d) *Prevent Multi-Agency Panel Duty Guidance: Protecting people vulnerable to being drawn into terrorism*. Available at: [Prevent Multi-Agency Panel Duty Guidance](#).

Lowe, D. (2017) Prevent Strategies: The Problems Associated in Defining Extremism: The Case of the United Kingdom', *Studies in Conflict and Terrorism*, 40(11).

Ministry of the Interior Security Policy Department (2021) *Report on Extremism and Prejudicial Hatred in the Territory of the Czech Republic*. Prague: Ministry of the Interior Security Policy Department.

Ministry of the Interior, Finland (2019) *National Action Plan for the Prevention of Violent Radicalisation and Extremism 2019-2023*. Ministry of the Interior: Finland. Available at: [National Action Plan for the Prevention of Violent Radicalisation and Extremism 2019-2023](#).

Mythen, G., Walkate, S. and Peatfield, E. (2017) 'Assembling and deconstructing radicalisation in PREVENT: A case of policy-based evidence making?', *Critical Social Policy*, 37(2).

Nasser-Eddine, M., Garnham, B., Agostino, K. and Caluya, G. (2011) *Countering Violent Extremism (CVE) Literature Review*. Australia: Australian Government. Available at: [Countering Violent Extremism \(CVE\) Literature Review](#).

New Zealand Government (2021) *New Zealand's Countering Terrorism and Violent Extremism Strategy*. New Zealand: Department of the Prime Minister and Cabinet. Available at: [New Zealand's Countering Terrorism and Violent Extremism Strategy](#).

New Zealand Security Intelligence Service (2021a) *NZSIS Director-General opening statement to Intelligence and Security Committee*. Available at: [NZSIS Director-General opening statement to Intelligence and Security Committee](#).

New Zealand Security Intelligence Service (2021b) *New Zealand's Violent Extremism Environment*. Available at: [New Zealand's Violent Extremism Environment](#).

Norwegian Ministry of Justice and Public Security (2014) *Action plan against Radicalisation and Violent Extremism*. Norway: Norwegian Ministry of Justice and Public Security. Available at: [Action plan against Radicalisation and Violent Extremism](#).

Regehr, K. (2022) 'In(ce)l)doctrination: How technologically facilitated misogyny moves violence off screens and on to streets', *New Media and Society*, 24(1).

Redgrave, H., Stott, J. and Tipple, C. (2020) *Countering Extremism: time to reboot?* London: Crest Advisory. Available at: [Countering Extremism: time to reboot?](#)

Saija, B., Gearon, L., Kuusisto, A. and Koirikivi, P. (2021) 'Threshold of Adversity: Resilience and the Prevention of Extremism Through Education', *Studies in Education*, 41(3), pp. 201–218.

Schmid, A. P. (2013) *Radicalisation, De-Radicalisation, Counter-Radicalisation: A Conceptual Discussion and Literature Review*. The Hague: International Centre for Counter-Terrorism. Available at: [Radicalisation, De-Radicalisation, Counter-Radicalisation: A Conceptual Discussion and Literature Review](#).

Schmid, A. P. (2014) *Violent and Non-Violent Extremism: Two Sides of the Same Coin?* The Hague: International Centre for Counter-Terrorism. Available at: [Violent and Non-Violent Extremism: Two Sides of the Same Coin?](#)

Scottish Government (2023) *Understanding extremism in Scotland: Evidence review*. Available at: [Understanding extremism in Scotland: Evidence review](#).

Sotlar, A. (2004) 'Some Problems with a Definition and Perception of Extremism within a Society' in Mesko, G. et al. (eds.) *Policing in Central and Eastern Europe: Dilemmas of Contemporary Criminal Justice*. Slovenia: Faculty of Criminal Justice, University of Maribor.

Swedish Government (2015) *Actions to Make Society More Resilient to Violent Extremism*. Stockholm: Swedish Government. Available at: [Actions to Make Society More Resilient to Violent Extremism](#).

Wilkinson and van Rij (2019) *An analysis of the Commission for Countering Extremism's call for evidence*. London: King's College London.



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