Comparative Analysis of CT/CVE Policies: USA, Canada, United Kingdom, Sweden, and North Macedonia

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Abstract

We conducted a comparative analysis of five countries' CT/CVE policies--USA, Canada, United Kingdom, Sweden and North Macedonia--to identify common values and themes. All policies address the need for strengthening collaborations at the local level, considering the important role civil society plays in the frontline response to violent extremism. All policies also stress the need to address a range of extremist ideologies including Jihadist, Far Left, and Far Right groups, and to address radicalization in the online space as well as through in-person interventions. The United States policy is innovative with respect to others because it introduces the concept of targeted violence. By doing so, it recognizes the importance of including situations where ideology is not a known motivating factor behind the acts of violence. All policies highlight the need for evidence and recognize that CT/CVE programs and policies have been widely implemented without scientific proof of their effectiveness.

Suggested Citation

Introduction

According to the United Nations Security Council, there is an increased need for a cohesive and holistic approach to countering terrorism and violent extremism. As noted in resolution 2178/2014[1], the Council highlights that countering violent extremism (CVE) is a fundamental element to handle the ongoing security challenges to democratic stability and peace coming from from terror group threats. In this resolution, the Council recommends that countries implement preventative measures that combat the proliferation of violent extremism, including education and promotion of social inclusion and cohesion at the community level. In addition, resolution 1624/2005[2] requires member States to restrict intolerance fueled by extremist ideologies and acts of incitement that can lead to terrorism. It also stresses the importance of civil society actors combining efforts to promote peace through education and deeper understanding of cultural and religious differences, promoting tolerance and coexistence.[3] The main focus is to address the conditions that are conducive to the spread of terrorism.[4] The Council recognizes repressive measures alone will not suffice in preventing acts of terrorism, and that it is imperative to consider the grievances that are exploited by terrorists and their supporters.[5] This manuscript presents an analysis of CT/CVE policies developed by five countries--USA, Canada, United Kingdom, Sweden and North Macedonia--with the intent of identifying common themes, shared values and approaches across CT/CVE systems that are at different levels of development.

CVE, AT and CT

Current policies designed to combat terrorism often include terminology related to three policy areas within the same policy document: countering violent extremism, counter-terrorism and anti-terrorism. These three areas are defined as follows. Countering Violent Extremism (CVE) refers to preventative actions designed to counter extremists from recruiting, radicalizing, and mobilizing followers, pushing them to commit acts of violence in the name of an ideology. Where possible, CVE activities are implemented as part of existing public safety efforts aimed at building resilience, inclusion, and preventing the weaponization of violence, but which do not include intelligence-gathering activities.[6] Anti-terrorism (AT) includes activities to deter terrorist acts.[7] AT is defensive in nature and relies on intelligence operations such as surveillance activities aimed at identifying specific threats, protecting potential terrorist targets, anticipating potential attacks, and neutralizing or mitigating the effects of such attacks.[8] Counter-terrorism (CT) is used to describe activities to counteract terrorists, it is offensive in nature and relies on operations[9] designed to capture terrorists and to actively defend specific targets from an attack.[10]

The existing linkage between AT and CT is intelligence, which is essential to dismantle and suppress violent extremist terror plots. On the other hand, the relationship between CVE and C/AT is much weaker and frequently the object of debate and scrutiny. As a result, CVE is frequently misinterpreted as a method of turning community members into actors of intelligence. To further complicate the debate, currently there is a lack of a unified definition of terrorism. The difference between a criminal act and an act perpetrated by a terrorist lies in the motivation of the individual. For example, the Las Vegas mass shooting[11] was a situation in which the U.S. federal definition of terrorism could not be applied due to a lack of information on the motive underlying the attack. Most of the 100 definitions on what constitutes an act of terror in use today[12] share three common themes; a violent act that is intended to create fear, is committed for some ideological goal, and deliberately targets or disregards the safety of innocent people. All three of these criteria are related to the motive of the perpetrator and not the act per se.

Methodology

Four out of the five countries included in this study were selected because they are participating in a joint project focused on the evaluation of policies and practices in CVE; the UK was added to the list because of its history of policy making in this field. The five policy documents underwent a qualitative analysis using systematic coding. Two reviewers assigned themes emerging from a close reading of the text and discussed results with a final re-assignment of codes that reflected both finer distinctions within themes and the relationship between topics and policies. We used the coded dataset created in NVivo v12 to develop the summary of findings for each theme as described below.

Findings

We begin with a description of the current U.S. policy followed by a comparative analysis of the policies from Canada, North Macedonia, United Kingdom, and Sweden.

USA: 2019 Countering Terrorism and Targeted Violence

Figure 1. Word Cloud U.S. CT/CVE Policy

The 2019 DHS Strategic Security Framework for Countering Terrorism and Targeted Violence[13] states that "the U.S is facing an increasingly complex, and evolving threat of terrorism and targeted violence from within its borders by means of non-state actors, critical to the U.S economy and democratic governance." Foreign terrorist organizations remain a major threat to domestic security, whether through directed attacks or by inspiring susceptible individuals within our borders to commit acts of terror.

However, the country is also challenged by a growing domestic threat from individuals inspired by violent extremist ideologies, as well as from those whose attacks are not perpetrated in the name of an ideology. In the 2019 U.S. policy, DHS highlights the need to confront these evolving challenges by building on promising practices, identifying innovative solutions, and developing a strategic holistic vision to prevent terrorism and targeted violence. The policy highlights how terrorism and targeted violence overlap, intersect, and interact as problems, and denotes the lack of a unified international legal construct which further undermines collaborations and prosecutions. It also addresses the need to develop a shared set of solutions. The introduction of the term "targeted violence" characterizes and differentiates this most recent policy from previous ones. As represented in the word cloud in Figure 1, the term "violence" is the most frequently cited term in the policy document, while the term "extremism" is rarely used. Targeted violence is defined as "*any incident of violence that implicates homeland security and/ or U.S. Department of Homeland Security (DHS) activities, and in which a known or knowable*

attacker selects a particular target prior to the violent attack."[13] The policy document continues by explaining the difference between terrorism and targeted violence: "*unlike terrorism, targeted violence includes attacks otherwise lacking a clearly discernible political, ideological, or religious motivation, but that are of such severity and magnitude as to suggest intent to inflict a degree of mass injury, destruction, or death commensurate with known terrorist tactics.* "[13] The terms terrorism, security, and prevention are included in the same policy document, sometimes without clear boundaries between the prevention of targeted violence and counter-terrorism operations. This lack of clarity is likely to cause confusion similarly to previous CVE policies and prevention frameworks, on the roles and responsibilities of different agencies working in prevention efforts.

Comparative analysis of themes across policies

The analysis of the five policies revealed the identification of several themes. For simplicity we have grouped the themes into five major categories (Figure 2). All themes are reported by frequency of codes as generated during the qualitative analysis in Figure 3.
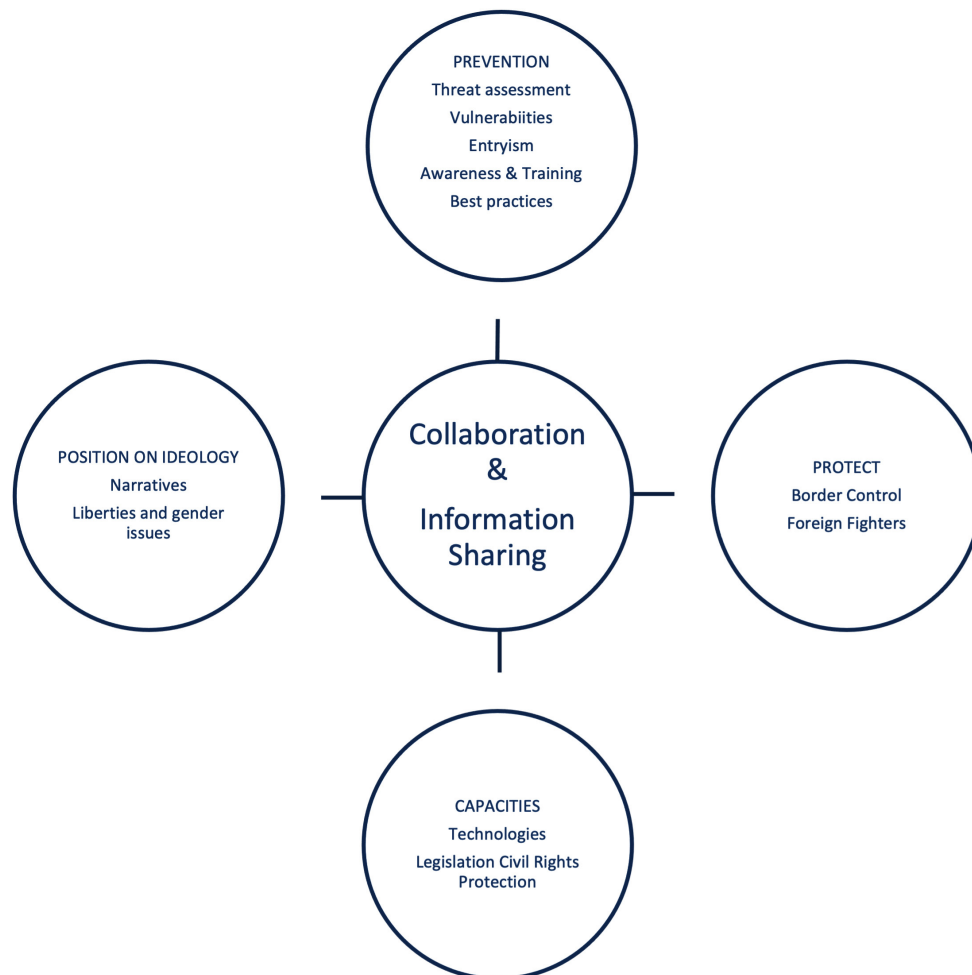

Figure 2. Policies Themes

The first category is about *collaboration and information sharing*. This category is a central theme extensively addressed by all policies as a priority area to prevent violent extremism and terrorism. The second category is related to countries' *capacities* to prevent terror and extremism including the use of technology and legislative ability to assure that activities are conducted with full protection of civil rights and liberties. The third category is about the policy's *position on ideology*. For example, all policies mention the groups they recognize as extreme or hate groups threatening the country. In particular, the UK policy includes specific actions taken to prevent further spread of extremists' views, such as creation of counter narratives and protection of liberties and rights aligned with British values (i.e. countering Shariah Law practices, frequently mentioned in the UK policy). The fourth category is focused on *prevention activities*. Such activities include the identification of threats and execution of threat assessments, addressing individuals' and societal vulnerabilities, preventing entryism in governmental positions (mentioned in the UK policy), developing ways to increase population awareness about violent extremism, and delivering training to professionals who may encounter violent extremists (i.e. schoolteachers, police officers, social workers, psychiatrists). Finally, the fifth category is about issues related to the *protection of spaces* such as potential targets of terrorism and border control. Figure 4 below represents the frequency of themes that emerged from the analysis of the policy documents. A detailed description of each theme follows in the text.
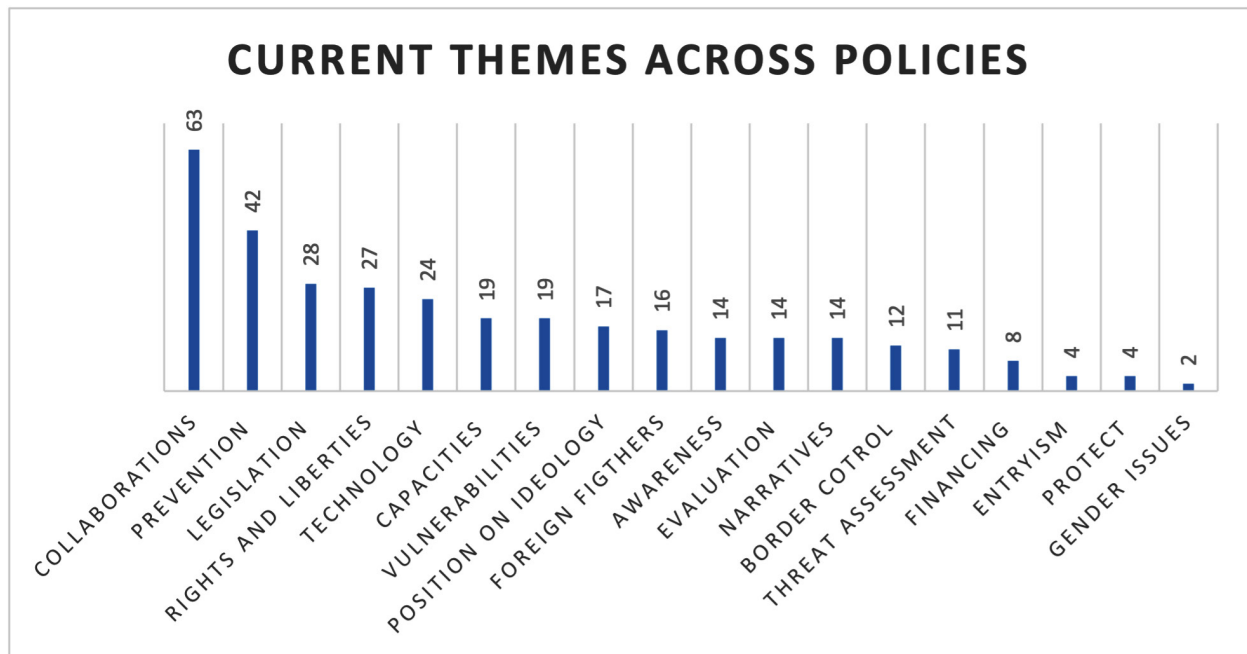

Figure. 3 Frequency of coded references by theme

Collaboration and Information Sharing

The **U.S policy document** recognizes that state, local, tribal, and territorial (SLTT) partners are often the ones in the best position to recognize and address specific threats in their jurisdictions. In terms of international collaborations, the document refers to the DHS's expansion of cooperation with foreign governments with the deployment of DHS personnel abroad working with foreign counterparts to develop standardized approaches of enforcement. The policy document also emphasizes the need for collaborations and partnerships with private sector companies with reference to their role in social resilience and prevention efforts at the local level.

The **Canadian policy** emphasizes the importance of multi-agency collaborations at the local, state, national and international level including the Five Eyes (Canada, USA, UK, Australia, and New Zealand), the G7, the EU, the Global Terrorism Forum, the United Nations, the Global Coalition against Daesh, the Institute for Strategic Dialogue, the Hedayah Center, and the Centre for Research and Evidence on Security Threats (CREST) in the UK.[14]

The **North Macedonian strategy** underlines the relevance of constant dialogue and collaboration between members of faith-based organizations, ethnic and cultural groups, and the need for building trust with religious organizations and community leaders. It also emphasizes the role of the government in developing a Western Balkan CVE/CT strategy and recognizes the importance of standardization across regional data-sharing platforms to enhance CVE/CT efforts.[15]

The **UK strategy** highlights the need for collaborations at the international level as well as the importance of "local people".[16] Members of the community are stakeholders and have a key role in identifying extremist behaviors and reporting to local authorities. The UK Government strategy supports people who want to stand up against extremism in their community and seeks to protect the victims of violent extremism. More specifically the policy highlights the efforts to create a new network of individuals, and the need to link civil society groups around Britain who are already standing up to extremists in their communities.[17]

The **Swedish strategy** emphasizes the need for increased cooperation and collaboration between all actors concerned. These efforts include a holistic view of the measures to *prevent, preempt or protect* against terrorists to reduce the effects of increasing radicalization and exclusion. The strategy specifically mentions the role of the CT Cooperative Council consisting of 14 agencies. The importance of establishing collaboration between security services, police, social services, schools, volunteers and religious leaders are highlighted in the policy document.

Prevention Activities

All five policy documents talk about the need for multidisciplinary work to prevent violent extremism and terrorism. Prevention programs are adopted across governments to detect and prevent intolerance, hate, and discrimination and promote social cohesion, encouraging communities to deter violent extremism by building resilient societies. Addressing the challenges of radicalization is a collaborative effort and must not to be undermined by understaffed and unresponsive community policing.

The **United States** policy encourages that efforts must be focused on multidisciplinary approaches and involve partnerships with societal stakeholders that can provide "off ramps away from terrorism and targeted violence, protecting the American people and reducing the burden on the criminal justice system ."[13]

The **Canadian policy** stresses the development of community engagement, training for teachers, and open dialogue on complex issues to provide people with safe avenues to discuss differences that lead to extremist views and acts of violence.

The **North Macedonian policy** states that the government can counter violent extremism by tackling the underlining conditions that drive extremists, by implementing training and teaching to open dialogue on complex issues and providing students and the society at large with avenues to discuss grievances. The government of North Macedonia acknowledges the necessity to engage in a multidisciplinary interagency collaboration that includes civil society in the process for reconciliation of ethnic and cultural divides and to educate and promote democratic values in schools and community faith-based organizations by assuming a leadership role in the Balkans on the fight against violent extremism.

The **Swedish policy** recognizes that counter-radicalization processes begin by promoting democracy, tolerance, and democratic values and by countering acts of discrimination and exclusion. The policy states the importance of identifying measures and capabilities to prevent radicalization and violent extremism with a holistic approach to *prevent, preempt, and protect* against crimes in a manner that does not lead people to become more radicalized. The Swedish policy emphasizes the importance of democratic values and measures that encourage individuals who may be at risk of radicalization or who may have anti-democratic violent ideologies to be more included, by encouraging them to leave extremists groups. The key factors on the frontline of preventing radicalization are social services, the school system associations, non-governmental organizations, religious leaders, and politicians all working together with law enforcement authorities to harness the efforts to prevent radicalization.

The **United Kingdom** policy underscores important steps for prevention by identifying charities and organizations that are financially linked to supporting extremist organizations. The policy also talks about a growing concern of peer-to-peer extremism within the prison system. The UK national program seeks to build more resilient teachers and schools that support and address the risk of radicalization. The UK Department of Education has introduced interventions to teach children intensively the fundamental principles of democracy and rules-based societies. The Higher Education Funding Council for England (HEFCE) is charged to supervise how universities are handling the risk of radicalization and implement policies to ensure extremist speakers are held accountable and do not go unchecked. The policy also recognizes the importance of reporting and solving hate crimes in a timely manner. The policy highlights solutions such as the Channel program, a voluntary program that provides personalized support to help individuals renounce violent behaviors and acts of radicalization.

Legislation

Legislation is another important theme cited across policies. The UN resolution 2178 of the 2014 UN Security Council is a binding international law which states that traveling or attempting to travel abroad with the purpose of planning or receiving terrorism training must be criminalized as an act of terrorism by all nation states. This resolution requires member states to provide information regarding financial and non-financial actors involved in criminal activities under the Money Laundry Act. The **Swedish government** has a piece of legislation[18] related to terrorist organizations that criminalizes any act of public provocation, recruitment, and training considered a terrorism offense, however these organizations are very few in the country. Sweden has adopted additional protocols from the Council of Europe on preventing terrorism which increase opportunities and obligations to work together in extradition. The **UK** has passed legislation for broadcasters who engage in extremist propaganda and share platforms for hateful messages especially if on the commercial scale. The government also uses immigration legislative powers to protect the public from extremists, for example by limiting and restricting people who preach hate from entering the UK. **North Macedonia** revised its counter-terrorism law in accordance with the UN Resolution. Since September 2014, the country's CT law embodies articles that criminalize involvement as a foreign terrorist fighter. (Please see: Law of Sept. 3, 2014, on Amendments to the Criminal Code of the Republic of Macedonia, -Official gazette, No. 164/14). The updated law has already been operationalized leading to multiple arrests across the municipalities.[19]

Civil Rights and Liberties

The **Swedish policy** clearly states that terrorism threatens the foundation of peace and security globally, fundamental rights, and the freedoms of democratic societies. All policies recognize the importance of privacy and civil rights. The Swedish policy states that freedom and rights may only be restricted to meet aims that are acceptable in a democratic society and only by using restrictive measures that are necessary, appropriate, and proportionate.

The **North Macedonian** policy states that radicalization becomes a threat to society when associated with violence or other unlawful acts, such as incitement to hatred. The **Canadian, U.S., and British** policies have similar stances in terms of civil rights to privacy.   Such rights are clearly undermined when profiles of potential terrorists are built upon stereotypes regarding the socio-economic status and religious ethnicity with other factors which in some cases have been questionable and unsubstantiated with solid evidence in court. Based on failed efforts, more recent initiatives have focused on behavioral models of escalation towards violence with an intentional move away from demographic profiling.

Use of Technology

All policy documents reveal the need to develop counter and alternative narratives to combat extremists' propaganda, as well as the need to collaborate with private companies who control online platforms. Criminals have adapted their skills to the opportunities provided by technology. The **UK policy** underlines the need for developing partnerships with the technology industry and law enforcement to eradicate terrorist and extremist material from the internet. The UK recognizes that the online space has been a great asset to ISIS and Al-Qaeda facilitating hate propaganda. As criminals adopt the use of technology in their criminal enterprise, law enforcement agencies must stay ahead of the curve adapting and countering attacks in cyberspace. The UK policy places high priority on stopping online recruiting and radicalization.[20]

North Macedonia recognizes that technology plays an important role as a facilitator of the process of radicalization and stipulates that "refining the comprehensive training and support for religious communities" must include "efforts to counter online radicalization ." [15] All five policies give significant attention to cyberspace as an evolving threat. The use of social media platforms has created vulnerabilities to exploit national governments with the dissemination of false propaganda and hate campaigns directed to weaken nation-states and democratic governance, especially in regions of the world prone to such exploitation. The U.S. policy cites disinformation and interference with domestic politics as a threat from both states and non-state actors hostile to the United States—using disinformation tactics targeting highly selective segments of the population with misleading intention to manipulate public opinion and affecting the democratic process of elections in America and around the globe. The five policies all recognize that public safety and security concerns must be approached from the international framework by creating the awareness of the dangers connected to terror attacks in cyberspace and to gain a better understanding of existing and new threats.

Discussion

The analysis of five countries' specific CT/CVE policies presents an opportunity to identify similarities and differences. The first most widely discussed theme is the need to maintain and expand *collaborations and information sharing* across countries; all five policies strongly emphasize the importance of collaborative efforts. Terrorism and violent extremism are not seen as isolated problems but as global issues to be addressed through international efforts and *intelligence sharing*. All policies address the need for strengthening collaborations at the local level, considering the role civil society plays in the frontline response to individuals that may be attracted by extremist groups within the country or from abroad. Prevention is seen as a holistic approach with the need for developing programs that address radicalization in the online space as well as through in person interventions. When individuals engaged in violent extremist groups come to the attention of social workers, teachers or law enforcement agents, these professionals should be trained to offer the subject alternative paths and disengagement opportunities; all policies discuss the need for such training.

Overall, the five policies describe very similar approaches to prevention efforts: the United States policy is innovative with respect to the others because it introduces the concept of *targeted violence*. By doing so, the United States recognizes the importance of including situations where ideology is not a motivating factor or where the motivations behind the act of violence are unknown.

To prevent radicalization, the US, Canada, UK, Sweden and North Macedonia are focused on taking proactive measures at the local community level. Working with religious organizations, NGOs and community leaders as well as with the private sector to address VE. The restriction of terrorist travel remains top priority for the U.S. and partner countries; this measure is supported by UN Security Council Resolution 2396 which mandates all nations to cooperate with border security and monitoring of travelers that pose a threat.[21] The Swedish policy distinguishes itself with detailed legislation supporting the prevention of terrorist acts; having a clear legal framework is certainly a point of strength of this policy.[22] The UK policy is more focused on the need to address ideology compared to the other policies; it addresses the ramifications that ideology may have into law and order, referring to the practice of *Shariah law* in the UK which is strongly linked to extremists' views not aligned with UK values. The Canadian policy is also similar to the US and UK policies, with a clear focus on the prevention of radicalization and interventions at the community level which are well described in the Canadian document.

With respect to data needs, most policies recognize the need for evidence on what strategies work and recognize the fact that programs and policies have been widely implemented without scientific proof of their effectiveness. The Canadian policy points to the need for identifying best practices that can be transferred from case to case. Professionals in various sectors have limited knowledge of violent extremism and in most cases are not being educated about these issues. There is a need to understand what type of training is most effective and what system-level functions should be improved to prevent violent extremism and terrorism. The policy documents consist of guiding instruments, however, when addressing CT and CVE efforts, they unfortunately lack clarity on the roles and responsibilities of the many agencies that may be potentially involved in prevention efforts, and there is still a nebulous space between these two areas of work, between CT and CVE, where security intercepts the sphere of social work and public health. There is a great urgency to address the root causes of violent extremism by using multidisciplinary approaches at the international, national, and local levels. While security measures are important in combating violence and terrorism, local efforts focused on resilience and prevention, possibly driven by data on what works and what does not work, are just as important to increase confidence and trust in the process. There is a need for the international community to come together under a unified umbrella with harmonized laws working on the highest level of collaboration and information sharing. Current efforts placed on diplomacy and aid resources that risk neglecting marginalized segments of the population need to be reconsidered in a time of a pandemic. As a matter of fact, more attention must be placed on how aid is distributed because the focus on building and supporting central governments' capacity without addressing the periphery will only make things worse in many countries by further alienating those that are already disenfranchised. In this regard, it is important to understand the impact of certain policies and CVE/CT actions. Science diplomacy efforts may be helpful to countries that have the desire to tackle common problems and build constructive international partnerships to understand what works in preventing violent extremism.[23]

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