



**The AVERT (Addressing Violent Extremism and Radicalisation to Terrorism)
Research Network**

Submission to the Independent National Security Legislation Monitor

*Defining Terrorism: Review of the Definition of a 'Terrorist Act' in section 100.1 of the
Criminal Code Act 1995*

21 October 2025

About AVERT

The Addressing Violent Extremism and Radicalisation to Terrorism (AVERT) Research Network is a multidisciplinary research initiative, administered by Deakin University, which brings together a wide range of research experts from Australian and international universities. It brings academics together with community and government partners who believe in conducting meaningful and robust research for the public good. As an Australian-based research network, we engage globally with research and practitioner colleagues, experts and institutions, while remaining strongly grounded in local contexts and knowledge.

Founded in 2018, AVERT aims to foster evidence-based understanding and reduction of the social harms created by violent extremism. Through its expert members, AVERT has significant expertise along the continuum of understanding, preventing and intervening in radicalisation to all forms of ideological violence, and the implications and impacts of this for social and community wellbeing.

Through a Memorandum of Understanding (MOU) with the Department of Home Affairs, we have worked in partnership with the Department's Research and Evaluation Working Group of the Countering Violent Extremism Subcommittee (CVESC) to provide empirically based research and capacity building to inform policy decisions, highlight countering violent extremism best practices, and advance understandings of violent extremism both in Australia and internationally.

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Introduction

Thank you for the opportunity to make a submission to the Independent National Security Legislation Monitor's (INSLM's) review of Australia's legal definition of terrorism. AVERT is an Australian-based, multidisciplinary, global research network dedicated to understanding and preventing terrorism, political violence, radicalisation and violent extremism. We welcome this inquiry. It is critically important to ask whether Australia's definition of terrorism needs updating, nearly a quarter century on from 9/11, in response to continually evolving threats.

There is no universally agreed upon definition of terrorism. Australia's threat environment has also evolved significantly from an era when groups such as al-Qaeda and Islamic State, which were both responsible for spectacular, large-scale attacks and impacts, were at their peak. The threat landscape is now more diverse and complex, with extremism of all stripes posing threats to national security, social cohesion, and healthy democratic functioning. Not only are there belief systems represented across the ideological spectrum; lone actors pick and choose from these belief systems to create new, hybrid threats that are less coherent and cohesive. Terrorist and violent extremist actions are now more likely to be committed by lone actors or small cells loosely aligned with different belief systems than by large, top-down organisationally led movements. Further complicating things, threats to Australia's national security are increasingly stoked by foreign influence.¹

This evolving threat climate is detailed in the INSLM's issues paper, the ASIO Director-General's annual threat assessments,² and in previous AVERT submissions to state and national inquiries on violent extremism.³ We do not retread this ground. As a diverse network of scholars with broad expertise across political science, psychology, sociology, criminology and other fields, we also do not offer specific recommendations for amending the law. Instead, we identify five key areas for

¹ See Mike Burgess, Director-General's Annual Threat Assessment 2025, Australian Security Intelligence Organisation, 19 February 2025.

² Ibid.

³ See AVERT Research Network. (2024). Submission to the Legal and Constitutional Affairs References Committee of the Senate, *Inquiry into right-wing extremist movements in Australia*; AVERT Research Network (2021). Submission to the Victorian Parliament Legislative Council Legal and Social Issues Committee; AVERT Research Network (2021). Submission to the Parliamentary Joint Committee on Intelligence and Security, *Inquiry into Extremist Movements and Radicalism in Australia*.

consideration. Our aim is to highlight core issues, based on scholarly literature and evidence, that the inquiry should consider when developing its recommendations.

Overall, our comments aim to ensure that Australia has a *targeted* legal definition of terrorism. This does not mean a narrow definition, but instead one that is appropriately tailored to terrorism's core nature. Compared to other crimes, terrorism is both *communicative* and *ideological*. A targeted definition is one clearly written that distinguishes terrorism, to the greatest extent possible, from related criminal acts. We echo the INSLM's comments that '[g]reat caution is needed if the definition were to be expanded and as much precision as possible is needed'.⁴ Especially in the current threat environment, it is crucial that a definition of terrorism clarifies and does not complicate our understanding of other diverse, evolving and potentially interrelated challenges. The idea of terrorism that shapes Australia's legal definition should not be diluted. The definition must also contain sufficient guardrails to ensure it targets resources towards terrorism as a fundamental threat to society – and does not expand to encompass a wider range of criminal behaviour.

Members of our Executive and Steering Committees discussed these issues at a recent academic roundtable with the INSLM office. We are grateful for that consultation and the opportunity to follow up with this written submission.

1. Terrorism is communicative

Compared to crimes like murder, assaults, arson or property damage, terrorism is communicative. As Michael Stohl has argued:

Acts of terrorism are not only behaviours with devastating violent effects, but are also behaviours *whose distinction from other acts of violence is that they are communicatively constituted*. That is, the actions are intended to send an audience a message of fear and to indicate that if policy and behaviours towards the terrorist (or those they purport to represent) do not change, more such terrorist actions will follow.⁵

Terrorism seeks change by impacting targets beyond the immediate victims. This has long been called 'propaganda of the deed',⁶ meaning that terrorist acts are not simply random killings: they are done with strategic and symbolic intent. Terrorism creates a *spectacle* which is designed to intimidate governments and their populations. It seeks to alter behaviour through fear and violence, undermining healthy democratic functioning. It is an unlawful tactic, used in the absence of legitimate political power, to change the way that societies function. It is expressive, instrumental violence. Understood in this way, terrorism is inherently political.

⁴ Independent National Security Legislation Monitor. (2025). *Defining terrorism: Issues paper – Review of the definition of a 'terrorist' act in section 100.1 of the Criminal Code Act 1995*, p. 9 (Australian Government).

⁵ Stohl, M. (2008). Old myths, new fantasies and the enduring realities of terrorism. *Critical Studies on Terrorism*, 1(1), 5-16 (emphasis added).

⁶ See, e.g., de Mesquita, E.B., & Dickson, E.S. (2007). The propaganda of the deed: terrorism, counterterrorism, and mobilization. *American Journal of Political Science*, 51(2), 364-381; Fleming, M. (1980). Propaganda by the deed: Terrorism and anarchist theory in late nineteenth-century Europe. *Studies in Conflict & Terrorism*, 4(1-4), 1-23.

The communicative aim underlying terrorism is captured in the ‘terrorist purpose’ limb of Australia’s Criminal Code definition. That sub-section states that conduct or a threat will constitute terrorism where it is done with the intention of:

- (1) Coercing, or influencing by intimidating, a government; or
- (2) Intimidating the public or a section of the public

These requirements are broadly consistent with international best practice and definitions of terrorism across the Five Eyes.⁷ However, the meaning of ‘section of the public’ remains unclear. One alternative would be to adopt phrasing from United Nations (UN) Security Council Resolution 1566, which includes acts intended to strike terror ‘in the general public or in a group of persons or particular persons’.⁸ Another, drawing on Canada’s definition, would be to include acts directed towards any person, government, domestic or international organisation.⁹ Those wordings may offer a useful starting point for updating the definition, and there is some consensus that ‘international governmental organisations’ (like the UN) should be included in this limb.¹⁰ However, any possible benefits of changing this limb must be weighed against the risk of diluting the current approach. At its core, terrorism is a fear-inducing, anti-democratic tactic directed towards governments and the general public. A narrower approach would be to clarify that terrorism is an act ‘intimidating the public or section of the public’, done *for the purpose of influencing government or broader societal behaviour*. This would serve to distinguish terrorism from other criminal acts that intimidate sections of the public – especially hate crime.

This does not mean that terrorism cannot target one or more individuals, a corporation, or any other group or organisation, as the intended victim(s) of an attack. The list of harms in sub-section (2) encompasses death, serious bodily injury, and other alternatives, without regard to the type or number of victims. The victims of a terrorist attack might be a small number of community members, police officers, religious leaders, a CEO, or any number of innocent bystanders. It could be the assassination of one political or social leader. The most important question, in any of these cases, is whether the attack is done with a wider communicative aim. Was it done to intimidate a government or the general public for the purpose of advancing some broader aim? In other words, was the act designed primarily to harm its intended victims, or were those victims the means to some political end, of seeking change in policy or public behaviour?

⁷ See Hardy, K., Ananian-Welsh, R., Tulich, T., & Dalla-Pozza, D. (2025). Australia’s legal definition of terrorism: United Nations and Five Eyes comparison, <https://www.inslm.gov.au/system/files/2025-08/united_nations_and_five_eyes_comparison.pdf>.

⁸ SC Res 1566, UN Doc S/RES/1566 (8 October 2004) [3].

⁹ *Criminal Code*, RSC 1985, c. C-46, s 83.01(b)(i)(B).

¹⁰ See Dalla-Pozza, D., Tulich, T., Ananian-Welsh, R., & Hardy, K. (2025). Commonwealth reviews considering the definition of a ‘terrorist act’ in s 100.1 of the *Criminal Code Act 1995* (Cth), <https://www.inslm.gov.au/system/files/2025-08/commonwealth_reviews_considering_the_definition_of_a_terrorist_act.pdf>.

2. Terrorism is ideological

In addition to being communicative, terrorism is *ideological*. Terrorist acts are done in the name of belief systems, to propagate those belief systems and advance a political or social agenda. This raises difficult, centuries-old questions about how to define ideology,¹¹ so we highlight one definition from a recent academic study where the authors sought a clearer definition of ideology suited to terrorism studies. For their inquiry, Ackerman and Burnham defined ideology, generally speaking, as:

a system of societal beliefs that is judgmental of the way things are and/or ought to be, is generally intended to be propagated, and claims exclusive explanatory power within the domain it encompasses.¹²

In other words, an ideology is a collection of related beliefs about society, which puts forward a vision for how things *should* be. For this reason, ideology has been defined by the sociologist Daniel Bell as an ‘action-oriented system of beliefs’.¹³ Ideologies do not just describe the way the world is; they guide and motivate people to act (or not act) in some specified way.

These ideas are captured well in a definition by Professor Winnifred Louis, one of AVERT’s Executive Committee members, and colleagues:

Ideologies are socially shared belief systems about society Like the narrower concept of frames for collective action..., ideologies include beliefs about what the world is, what the problems are that a society is facing, what the solutions should be, and what motivations and values are appropriate to guide decisions.¹⁴

The ideological purpose underlying terrorism is captured in Australia’s legal definition of terrorism via the ‘terrorist motive’ limb. That limb states that conduct or a threat will constitute terrorism if it is done to advance a ‘political, religious or ideological cause’. This clearly distinguishes Australia’s terrorism offences from crimes like murder, assaults, or wilful damage to property, where the reason *why* someone commits the offence is not relevant to establishing criminal guilt. The terrorist motive requirement makes the *why* a core element of the criminal conduct.

Arguably, the terrorist purpose element – which captures an intention to intimidate governments and populations – is sufficient to distinguish terrorism from other crimes like murder and assaults. That limb captures terrorism’s communicative, instrumental purpose as a tactic designed to influence behaviour. Still, the motive requirement aids further in distinguishing terrorism from other crimes by capturing the belief

¹¹ See, e.g., Stråth, B. (2013). Ideology and conceptual history. In M. Freeden and M. Stears (Eds.), *The Oxford Handbook of Political Ideologies* (pp. 3-19). Oxford: Oxford University Press.

¹² Ackerman, G.A, & Burnham, M. (2021). Towards a definition of terrorist ideology. *Terrorism and Political Violence*, 33(6), 1160-1190.

¹³ Bell, D. (1962). *The end of ideology: on the exhaustion of political ideas in the fifties*. New York: Free Press.

¹⁴ Louis, W. R., Chonu, G. K., Minto, K., & Wibisono, S. (2025). *The Psychology of System Change and Resistance to Change: A New Psychology of Intergroup Relations*, p. 72. Cambridge: Cambridge University Press.

systems the communicative, instrumental action is designed to advance. Scholars differ in how much they emphasise the instrumental or ideological nature of terrorism when analysing pathways to radicalisation,¹⁵ but both remain important to understanding terrorism as a distinct form of political and criminal behaviour. We also note that removing the motive limb altogether would be a significant departure from our closest Five Eyes allies.¹⁶

The role of ideology in terrorism remains contested in part because our understanding of risk factors for radicalisation to violence has improved considerably in recent years. Ideology was long considered the dominant driver of terrorism, but now repeated studies have shown that multiple, intersecting risk factors, including a lack of purpose and identity, group influence, and difficult family upbringings, can lead people to seek out terrorist content and progress towards violent action.¹⁷ Many of these are common criminogenic risk factors for all types of crime. It is also clear that many people can hold extreme beliefs without acting on them.¹⁸ Understood in this way, ideology can sometimes be a cover for underlying grievances and risk factors, and a pretext for terrorist groups to recruit new members, than the core driving force behind terrorism. There has been a clear trend away from the language of ‘deradicalisation’, involving programs to change a person’s extreme beliefs, towards ‘disengagement’ efforts that seek to alter violent behaviour.¹⁹ These aim to prevent terrorism by addressing ordinary, underlying risk factors – not beliefs per se.

Ideology may not be as important as it once was to programs for *preventing* terrorism, but we believe it is still important for *defining* terrorism as a distinct type of criminal conduct. Similar risk factors for radicalisation could lead a young person to join a gang, sell drugs, or engage in any other criminal behaviour. If we do not sufficiently acknowledge and consider the role that ideology plays in terrorist threats, the lines between terrorism and other crime types become increasingly blurred.

3. ‘Religious’ motive

While ideology remains important to defining terrorism, caution is needed when identifying the types of ideologies that can drive terrorist action. We acknowledge the significant concerns, raised not only but especially by Muslim community leaders and advocacy groups, that the current reference to ‘religious’ causes in Australia’s legal definition of terrorism fuels damaging perceptions of a link between Islam and

¹⁵ Ackerman & Burnham, n 12, p. 1161.

¹⁶ See Hardy et al., n 7.

¹⁷ See, e.g., Della Porta, D. (2018). Radicalization: A relational perspective. *Annual Review of Political Science*, 21, 461-74; McCauley, C., & Moskalenko, S. (2008). Mechanisms of political radicalization: Pathways toward terrorism. *Terrorism and Political Violence*, 20(3), 415-433; Wilner, A., & Dubouloz, C. (2010). Homegrown terrorism and transformative learning: An interdisciplinary approach to understanding radicalization. *Global Change, Peace & Security*, 22(1), 33-51.

¹⁸ Borum, R. (2011). Radicalization into violent extremism I: A review of social science theories. *Journal of Strategic Security*, 4(4), 7-36.

¹⁹ Windisch, S., et al. (2016). Disengagement from Ideologically-Based and Violent Organizations. *Journal for Deradicalization*, 9, 1-38.

terrorism.²⁰ Islamophobia remains at highly concerning levels in Australia,²¹ and while it can be difficult to trace a direct causal link to the legal definition, there is well documented evidence that punitive counterterrorism regimes have contributed to adverse perception of Muslims within Western democracies and that Muslims communities have felt targeted by the state under those measures.²²

This is not to deny the reality that many terrorist groups frame their ideologies in terms of religious duties and goals. Nor should we uncritically privilege what religion and terrorism studies scholar Lorne Dawson terms the ‘secular normative bias’ in modern scholarship, which routinely downplays the deeply felt nature of religious motivation for some terrorist actors and groups.²³ Understanding threats from al-Qaeda, Islamic State and other terrorist organisations requires understanding how those groups justify violence through religious doctrine. Cults, lone actors, political Christian, Hindu, Buddhist, millennialist and other far-right and conspiracy-based movements also use religious beliefs to justify terrorism.²⁴ It is this justification of violence on distorted or idiosyncratic religious grounds which fuels perceptions of religion causing terrorism. Terrorism framed in terms of religious duties has also been linked to higher fatalities and the use of suicide as a tactic.²⁵ It is impossible to understand historical and evolving threats of terrorism without some consideration of the role that religious belief systems play in terrorist threats, targets and tactics.

A more accurate way to think about the role of religion in terrorism – to avoid harmful perceptions of mainstream religion – is to say that terrorism is often committed *in the name of* religion, but not *because of* it. A report by the Legal Frameworks Working Group for the Global Internet Forum to Counter Terrorism (GIFCT) explains this dynamic well and the risks it creates for public sentiment:

Terrorist groups such as al-Qaeda and Daesh have attempted to justify their actions based on a distorted rhetoric of Islam; by accepting their proclaimed identity as religious movements, it logically follows that public discourse will assume a link between Islamic jihad and terrorism ... Therefore, the inclusion of religious motives

²⁰ See, eg, Australian Muslim Advocacy Network. (2025). Reforming the definition of a terrorist act, <<https://www.aman.net.au/what-we-do/reforming-the-definition-of-a-terrorist-act/>>; Jabri-Markwell, R. (2023). Religion as a motive: Does Australian terrorism law service justice? *International Journal for Crime, Justice and Social Democracy*, 12(3) <<https://www.crimejusticejournal.com/article/view/2686/1348>>; Abdalla, M., & Jabri-Markwell, R. (2022). The case for removing religion from Australia’s definition of terrorism, *ABC Religion & Ethics*, <<https://www.abc.net.au/religion/removing-religion-from-terrorism-definition-mohamad-abdalla-and/14050702>>.

²¹ See Malik, A. (2025). *A National Response to Islamophobia: A Strategic Framework for Inclusion, Safety and Prosperity* (Office of the Special Envoy to Counter Islamophobia).

²² See, e.g., Abbas, T. (2021). Countering violent extremism: the international deradicalisation agenda. New York: Bloomsbury; Cherney, A., & Hartley, J. (2017). Community engagement to tackle terrorism and violent extremism: challenges, tensions and pitfalls. *Policing & Society*, 27(7), 750-763.

²³ Dawson, L. (2018) ‘Debating the role of religion in the motivation of religious terrorism’, *Nordic Journal of Religion and Society*, 31(2), 98-117.

²⁴ See the following recently published book, which includes chapters written by several AVERT members: Grossman, M., & Hellyer, H.A. (Eds.). (2025). *Rethinking religion and radicalization: terrorism and violence twenty years after 9/11*. New York: Bloomsbury.

²⁵ Hoffman, B. (2017). *Inside Terrorism* (3rd ed.). New York: Columbia University Press.

may be ‘misunderstood as targeting the entire group who wish to advance the religious cause of Islam’, which is counterproductive.²⁶

One approach to address this dynamic in a legal definition would be to simply remove ‘religious’ causes from the motive requirement. This would leave ‘political’ and ‘ideological’ causes. However, many scholars still emphasise the reality that terrorism is often justified in religious terms.²⁷ Another approach would be to focus the motive requirement on ‘ideological’ causes, and to list sub-types of belief systems that terrorist groups use to justify their actions – including religion. A clause could acknowledge that an ideology can be based on beliefs about politics, government, religion, race, gender, sexuality, or any other aspect of society – without giving special weight to political or religious beliefs as core drivers of terrorism. This approach would lessen the implied links between religion and terrorism, while still recognising the role that religious – or any other – beliefs can play in terrorism. This approach would also mean that Australia’s legal definition of terrorism is better placed to deal with mixed and evolving threats, and future threats yet unknown.

4. Mixed and unclear motives

The current threat environment raises difficult questions about whether mixed and unclear motives can satisfy the motive requirement in Australia’s legal definition of terrorism. Above, we explained ideologies as ‘belief systems’ that legitimate or call for action in pursuit of change according to a worldview. However, there remains a difficult question as to how much cohesion and coherence is needed for a collection of beliefs to constitute an ideology. Without going into excess detail, the beliefs of al-Qaeda and Islamic State constitute a clear ideology: they are readily identifiable, list clear grievances and enemies, and justify violence in pursuit of the cause. The beliefs are cohesive and coherent, insofar as they relate to each other, form a recognisable whole, and are internally logical and consistent, even if many in the wider community would disagree with them.

However, as ASIO’s Director-General detailed in his recent annual threat assessment,²⁸ current threats do not always follow identifiable patterns. So-called ‘mixed, unclear, unstable’ threats, especially from lone actors, draw on varied, even contradictory, beliefs. Conspiracy-fuelled extremism spouts theories that are often irrational, even nonsensical. Can these varied beliefs still be ideological?

Ackerman and Burnham, in the article we referred to earlier, do not set a high bar with respect to the coherence and cohesion an ideology requires:

²⁶ Saltman, E. (2022). *Introducing 2022 GIFCT working group outputs*. Global Internet Forum to Counter Terrorism, < <https://gifct.org/wp-content/uploads/2022/07/GIFCT-22WG-ExecSummary-1.1.pdf>>.

²⁷ See, e.g., Coady, C.A.J. (2021). *The meaning of terrorism*. Oxford: Oxford University Press; Hoffman, B. (1995). “Holy terror”: The implications of terrorism motivated by a religious imperative. *Studies in Conflict & Terrorism*, 18(4), 271-284.

²⁸ Burgess, n 1.

Despite occasionally appearing arbitrary or obscure from an outsider's perspective, the ideas contained in an ideology are *at least minimally coherent in the sense of having some characteristics by which they are related to each other* and can thus be used to distinguish the whole from other sets of ideas.²⁹

In other words, provided that the specific beliefs a person follows relate to each other to a minimal degree, to the point where they can at least be distinguished from the sets of beliefs followed by other people – this still constitutes an ideology.

On this understanding, a young person who adopts some aspects of far-right extremism and some aspects of Salafi-Jihadism, for example, is still following an ideology, provided their particular collection of beliefs can be identified from the collections of beliefs held by others. Given that mixed or contradictory beliefs like these can still drive terrorist behaviour,³⁰ there also seems no policy reason to treat readily identifiable ideologies any differently from idiosyncratic curations. Coherent ideologies are likely capable of motivating more people, in that they do not suffer from the same internal contradictions and so more people are likely to identify with them, but incoherent or irrational ideologies can still drive terrorism,³¹ and in some ways may be more volatile in terms of their action-oriented outcomes.

5. Overlap with hate crime

Where violence is not driven by a system of beliefs, but is instead motivated by hatred, prejudice, revenge, monetary gain, or any other reason, it should not be treated as terrorism. Murder, assault, arson, wilful damage, vilification and countless other offences remain valid possibilities where there is no underlying ideological motive (or insufficient evidence of one). Amongst these alternatives, distinguishing hate crime from ideologically driven terrorism remains a particular challenge.

There is limited international consensus on how to define crime motivated by hate.³² Some scholars define hate crime as criminal behaviour which intentionally targets groups that are identified by a protected attribute – such as race, religion, or sexuality. Broader approaches define hate crime as any malicious behaviour motivated by hate, regardless of whether it is a crime or not. For example, yelling abuse at a person on the street because of their racial or religious background might be considered a hate crime, even if it is not a criminal offence. Whether or not an incident like this is recorded as a hate crime or not often depends on the organisation or researchers collecting the data and the specific criteria they use.³³

²⁹ Ackerman & Burnham, n 7, p. 1166 (emphasis added).

³⁰ Burgess, n 1.

³¹ Louis et al., n 14.

³² Vergani, M., et al. (2024). Mapping the scientific knowledge and approaches to defining and measuring hate crime, hate speech, and hate incidents: A systematic review. *Campbell Systematic Reviews*, 20(2), 1-54.

³³ Ibid.

Distinguishing hate crime from terrorism is even more difficult.³⁴ One approach would be to say hate crimes are typically spontaneous (like the example above of street abuse) and terrorism is typically premeditated. However, many recent terrorist attacks (e.g. stabbings and vehicle attacks) involve minimal preparation with a very short lead time to action. Conversely, hate crimes (e.g. a shooting in an LGBTIQ+ nightclub) can be highly planned and cause significant casualties. Another would be to say that terrorism is ideological and designed to intimidate sections of the public – but this is also true of many hate crimes. Ultimately, many criminal acts can be simultaneously terrorism and a hate crime (and any other relevant offence). The Christchurch massacre provides a clear example: the gunman was prosecuted for both terrorism and murder, and his actions were also clearly a hate crime targeting New Zealand’s Muslim community. It is common for the same criminal behaviour to possibly constitute multiple offences, and terrorism is no exception.

Returning to the core nature of terrorism as *communicative* and *ideological* can help to distinguish it from hate crime as much as is possible. For any given incident, it is useful to ask to what extent was it:

- (1) Designed to influence a government or the general public by intimidation, thereby having an impact beyond its immediate victims?
- (2) Motivated by a belief system that identifies specific grievances and calls for violence against perceived enemies?

The more an incident satisfies these criteria – where victims are the means to an end of seeking wider political change in line with a belief system – the more it aligns with terrorism. If, on the other hand, there is no wider aim beyond harming the immediate victims, and no belief system other than hatred or prejudice towards the group on the identified by a protected attribute, it is more likely to be a hate crime. Still, hate crimes can be highly ideological and designed to intimidate sections of the public, so there will still be many cases that fall into both camps.

These challenges in distinguishing terrorism and hate crime, complicated further by mixed and unclear ideologies, make even stronger the case for a targeted legal definition of terrorism that enhances our understanding of current threats. We look forward to discussing these and any other issues further with the INSLM office as this important inquiry progresses.

³⁴ See, e.g., Mills, C.E., Freilich, J.D., & Chermak, S.M. (2015). Extreme hatred: Revisiting the hate crime and terrorism relationship to determine whether they are “close cousins” or “distant relatives”. *Crime & Delinquency*, 63(10), 1191-1223; King, R.D., DeMarco, L.M., & VandenBerg, R.J. (2017). Similar from a distance: A comparison of terrorism and hate crime. In G. LaFree and J.D. Freilich (Eds.), *The Handbook of the Criminology of Terrorism* (pp. 385-401). New Jersey: John Wiley & Sons.