

Private security and national security: The case of Estonia

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Abstract

Most studies of private security postulate exclusively internal, primarily economic, causes of the industry's growth and regulation. In contrast, based on the case of post-Soviet Estonia, we investigate how a state's external security environment influences private security. Estonia's tense relations with neighbouring Russia and related pursuit of EU and NATO membership have generated several policies through which private security evolved from a lawless, politically contested industry to a modest, lightly regulated one: (1) the exclusion of public police from private security and an effective campaign against organized crime that together enabled an autonomous and non-criminalized security industry to emerge, (2) free-trade policies that permitted western companies to acquire Estonian security firms, and (3) an 'all-of-nation' approach to national security that promotes comprehensive state-civil society security cooperation. Estonia thus clarifies how high politics shapes private security, while also revealing the factors that make the industry relatively uncontentious in most industrialized democracies.

Keywords

Comparative criminology, cyber crime, Europe, international crime, military, organized crime, police and policing, private security, Russia, security management

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Estonia's private security industry from 'Wild West' to European standard

On the northeast Baltic shore, Estonia, one of Europe's smallest countries, has enjoyed remarkable success since regaining independence from the Soviet Union in 1991. A stable democracy and one of the richest post-communist European states, Estonia is famed for its high-tech sector and 'e-government' innovations. Having joined all three of the Global North's key international clubs (the North Atlantic Treaty Organization (NATO) and the European Union (EU) in 2004, and the Organization for Economic Cooperation and Development (OECD) in 2010), Estonia has clearly 'arrived'. Yet the Soviet past remains present in the country's adversarial relationship with its neighbour, Russia. Even the stationing of NATO troops in Estonia has not dispelled anxiety over Russian aggression. In 2007, Estonia experienced the world's first politically motivated cyberattacks against a sovereign state: after the relocation of a Soviet war monument led to rioting in the capital, Tallinn, three weeks of cyberattacks targeted government, banking, and media websites. Estonia is also an espionage hotbed, and unlike most European states, it publicly unmask Russian moles, sometimes in high positions. In addition, the Russia–Estonia border is one of the tensest in Europe. In 2014, an Estonian internal security service officer was abducted from Estonia into Russia, possibly with help from Russian organized crime (Whitmore, 2015). As a result, Estonia retains military conscription and promotes citizens' involvement in a nationwide civil defence programme.

Indeed, Estonians' awareness that their republic is tenuous shapes all aspects of their society. Here we analyse how the country's geopolitical environment influences domestic policing institutions, particularly private policing. In Singh and Light (2019), noting that most studies of private security in Anglosphere countries focus on internal political influences on the industry, we suggested that major internal *and* external threats to regime survival should lead to a greater state role in shaping private security. While this need not mean more restrictions on private security companies, it presumably would mean greater state involvement in their development and regulation, including in Estonia. Yet our research yielded surprising findings. On the one hand, the Estonian industry is of modest size and its current regulatory regime resembles those of other EU countries. On the other, the industry also features a chequered post-communist history in which a swashbuckling early phase gave way to a staid contemporary reality.

Below we argue that the extant literature neglects the influence of national security factors on the industry's development. We then introduce Estonia's recent political trajectory and lay out how, in this highly securitized society, the private security sector today is relatively small, lightly regulated, and uncontroversial, whereas in the early 1990s, it was lawless and politically contested. This trajectory contrasts with most other post-Soviet countries, where the industry remains linked to organized crime and coercive state institutions. We identify several factors that have tamed Estonia's private security industry:

1. the strict separation of public and private policing, combined with a successful anti-organized crime campaign, which together enabled an autonomous and non-criminalized private security industry;

2. a policy permitting European companies, regarded as politically safe owners, to acquire Estonian security firms; and
3. a public–private–civil society security nexus, which embeds private policing in a broader ecology of conscription, civil defence, and liberal gun regulation.

These factors reflect strategic decisions early in Estonia's regained independence concerning the country's overall political and economic order, which in turn were meant to create a liberal regime anchored in the EU and NATO and buffered from Russia. Thus, while international politics *does* influence the development of private security, it does so primarily through higher-level institutional and policy choices, in turn influenced by geopolitical positioning. As a related matter, Estonia's experience also suggests that only certain broad structural conditions enable the emergence of a private security sector characteristic of the Global North, namely the industry's political neutralization and its embedding in a functioning security ecology.

Main data sources comprise Estonian government and industry reports, legislation (Appendix 2), press and analytical publications, and scholarly publications. Some sources were in English, and others were translated from the Estonian by Josh Gold.¹ In tracing the development of Estonian policing, we draw on the relatively few academic studies analysing this subject. Ramon Loik, one of our interviewees, has examined the evolution of Estonia's national security and police institutions and their battle against organized crime (Loik and Smith, 2015; Loik et al., 2016). Hakala (2012) analyses Estonia's private security industry regulation in comparative perspective. Saar (2004) addresses crime and law enforcement in the 1990s and 2000s. We also draw on political science studies of Estonia's transition to liberal capitalism (Abrams and Fish, 2015; Feldmann, 2001, 2006, 2017, 2018; Raudla and Kattel, 2011). Oral histories of the evolution of policing in Estonia came from key informant interviews undertaken by all three authors in Tallinn in October 2019, when we also collected many of the primary sources cited here (Appendix 1). Interviews were conducted in English with the exception of two where Gold provided simultaneous interpretation. Interviewees were active in the development and regulation of Estonian private security and were recruited through Gold's contacts in the Estonian government. All seven were men, reflecting the male-dominated policing milieu. They included current and former advisors in the Ministry of the Interior, which is responsible for public order, internal security, border control, and civil society co-ordination; police officers; the former head of security for the Estonian National Railway; the Chair of the Firearms Licensing Commission; the President of the private security industry's national federation; and media and civil defence actors. Interviews were semi-structured and explored themes identified by our previous study (Singh and Light, 2019), the extant literature on Estonia policing, and the interviewees themselves. Although the narrative history of the Estonian security industry comes from documentary sources and secondary literature, our interviews in Tallinn fleshed out the motivations and assumptions of actors involved in shaping the industry, particularly by bringing out the connections between national security and private security.

The neglected association between national security and private security

Most studies of private security development neglect external factors such as interstate relations (e.g. whether neighbouring states are friendly or hostile), macro-political conditions (e.g. political or economic instability), and international security threats (including actual hostilities). Instead, the predominantly Anglo-American policing literature looks to internal factors—including crime rates, public fear of crime and subjective insecurity, police capacity and legitimacy, domestic political debates, market and property relations, and consumption patterns—sembled into primarily economic explanations (for a theoretical overview, see also Jones and Newburn, 1998; see White, 2012).

Marxian studies, such as Spitzer and Scull (2014), link private security evolution to the relationship between the state and the dominant class in successive historical stages (for a different Marxist analysis, see Rigakos, 2002). While other theories are less deterministic, as White (2012) notes, most nonetheless offer predominately economic explanations. For some theorists, increased citizen and corporate demands for domestic security could not be met by state police, who were overburdened and constrained by their crime control focus and existing private property laws (see Shearing and Stenning, 1983). For others, market expansion resulted from elimination of occupations where security constituted a secondary function (Jones and Newburn, 2002); or from neoliberal reframing of citizens as economic actors exercising choice.

An ongoing normative debate between two frameworks, nodal governance (Button, 2008; Johnston and Shearing, 2003; Wood and Shearing, 2007) and anchored pluralism (Loader and Walker, 2001, 2006, 2007), centres on whether security should be a state good or a market commodity. The anchored pluralism school favours state regulation, while nodal governance favours non-state regulation of policing networks (White, 2012). Nevertheless, both models understand private security primarily in relation to public police. As a result, the mainstream Anglo-American literature has generally not examined the relationship between private security and public institutions other than police, such as the military. Also neglected are geopolitical and macroeconomic factors, such as private security's ties to foreign governments, transnational organized crime, regional trade relations, insurgency, and interstate conflict (for notable exceptions, see Johnston, 2006). A few investigations concern the industry's development in transitional democracies and authoritarian states in the 'Global South' and the post-Soviet region, revealing the political questions that private security presents to such regimes. For example, private security may threaten the regime's existence (Light and Slonimerov, 2020; Singh and Light, 2019), or as in post-Apartheid South Africa, it may constitute a legacy of an illiberal government (Singh, 2008). These studies reveal private security as political actors, whether or not they are independent of the state.

A separate literature on private military companies does address their linkages with (mostly illiberal) governments as well as state and non-state military structures. These studies examine how external or extra-territorial threats to fragile states, such as border disputes or armed conflict between or within states, stimulate private military companies to enter new markets. For example, Singer (2003) documents how Blackwater and other private military companies profited from the US and UK occupation of Iraq. Yet

private military companies have been regulated separately from private security, and with few exceptions (e.g. Sheptycki, 2007), the literature implicitly follows this divide. Some research on private military companies also notes the political sensitivity of private security. Thus, Dorn and Levi (2007) explore how European debates on regulation of private military companies, corporate investigative services, and private security guards are shaped by domestic security and economic policies, EU directives, and international law.² Yet there is seldom any crossover of researchers between these two literatures. Indeed, research on private military companies owes more to international relations than criminology, reflecting the latter's general focus on *intra*-state factors rather than *inter*-state ones, which Loader and Percy (2012) have criticized, calling for analysis of security to bridge crime and war.

In addition, since the 1980s, the conventional criminological view holds that private security performs exclusively low or public order policing, ignoring the (geo)political dimension of the industry, including its involvement in high policing and connections to the military, other state agencies, and quasi-state authorities. A notable exception is O'Reilly (2010, 2015), who analyses the partial privatization of high security and emergence of 'international security consultancies' that bridge the public–private divide. Like O'Reilly, we investigate how international politics influences private security. However, whereas he analyses how a specialized international market emerges from intelligence services and militaries, we examine how national security and international politics influence domestic private security in general.

In truth, both 'internal' and 'external' factors shape the industry, even in the Anglo-American cases that dominate the literature. For example, UK regulatory debates during the 1970s noted that the South African apartheid regime had hired British private detectives to gather intelligence on anti-apartheid activists on British soil (Button, 2008). Unlike Estonia, however, Anglosphere regimes have recently not interpreted private security as a threat to their survival. Below we show how international politics concerns initially placed private security in the realm of high politics in Estonia, until those concerns were largely resolved.

Estonia and its private security industry

Estonia has formed a frontier between Europe and the Russian state since the Middle Ages. The Estonian language is closely related to Finnish, so that under Soviet occupation people in Tallinn—unlike elsewhere in the Union of Soviet Socialist Republics (USSR)—could access uncensored news broadcasts from Helsinki, just across the Gulf of Finland. After centuries of rule by German, Danish, and Swedish overlords, and then by the Russian Empire, Estonia achieved independence after the First World War. The interwar republic implemented land reform, established social welfare institutions, and adopted one of the region's most liberal policies towards ethnic minorities (Taylor, 2018: 50, 55). Soon, though, the Second World War plunged Estonia into alternating Nazi and Soviet occupations. While most states never recognized the Soviet Union's 1940 annexation of the country, it lasted nearly five decades, bringing drastic consequences. During and after the war, thousands of Estonians fled into exile abroad, and the Soviet authorities sent many others to Siberian prison camps

(Taylor, 2018: 80, 93, 112). Also, under Soviet rule, thousands of Russian-speaking people from the USSR settled in Estonia, accounting for approximately 30% of the population by the 1980s (Taylor, 2018: 159).

Along with the other Baltic republics, Latvia and Lithuania, Estonia regained independence shortly before the Soviet Union dissolved. Like its neighbours, the restored republic confronted an economic and social crisis. In response, successive governments not only privatized state enterprises, as in other post-Soviet states, but also imposed ‘hard budget constraints’ on the now-private firms, meaning that they could not use political connections to obtain subsidies or other preferential treatment (Abrams and Fish, 2015: 492). Estonia thus avoided the emergence of ‘oligarchs’, or politically connected magnates, who would have constituted appealing partners for their counterparts in Russia (Abrams and Fish, 2015: 497). Estonia also slashed import duties and restrictions on foreign business activity, in part to limit ties with Russia, even permitting the country’s financial sector to become dominated by banks from elsewhere in Europe (Feldmann, 2017, 2018). These policies deliberately promoted accession to the EU and later the euro (Feldmann, 2001; Raudla and Kattel, 2011). They also undermined the Soviet industrial sector, in which Russian-speakers were highly represented, enabling ethnic Estonians to dominate the new economy (Feldmann, 2006, 2018). In short, Estonia’s post-Soviet restructuring was motivated less by free-market purism than by a broader strategy of linking the national economy to politically acceptable forces.

Estonia also invested early in the digital economy and public administration—an ‘e-government’ infrastructure to promote efficiency and innovation. From the mid-1990s, Estonia became one of the world’s most wired countries. For two decades, a digital ID for each citizen has enabled online access to almost all state services, including voting (Gold, 2019). As intended, all these policies generated an economy less dependent on Russia, down to the creation of a separate Baltic electricity grid (Stoicescu, 2021). In contrast, integrating the large Russian-speaking minority has been challenging, with Estonia initially criticized for granting citizenship only to citizens as of 1940 and their descendants, thus excluding most Russian-speakers. Naturalization procedures were subsequently eased, and most Russian-speaking Estonians are now content as either naturalized citizens or permanent residents, although inequalities remain (Fein and Straughn, 2014).

Estonia also faces a challenging international environment. NATO considers the Baltic republics, the only post-Soviet states to gain NATO and EU membership, likely first targets of Russian invasion in a possible war (Stoicescu, 2021). As noted, the 2007 relocation of the ‘Bronze Soldier’, a monument to Soviet Second World War soldiers, led to riots instigated by Russia. Russia’s aggression in Georgia in 2008, and particularly its 2014 occupation of Ukraine’s Crimean Peninsula and portions of eastern Ukraine, sharpened these concerns. While few in Estonia’s Russian-speaking community seek annexation by Russia (Trimbach and O’Lear, 2015), both military and financial threats to regime survival are far more salient than in most EU states. Thus, in 2017–2018, the Estonian subsidiary of Danske Bank became embroiled in a massive money-laundering scandal—possibly the largest ever—after the bank failed to screen transactions in which some 200 billion euros in Russian funds were unlawfully deposited into European banks (Coppola, 2018).

Yet, contrary to our expectations that Estonia's *national* security concerns would make *private* security a sensitive policy area, this does not seem to be the case at present. Following a public lecture by a former president of Estonia on the country's e-government achievements, one of us shared our research with him only to meet with the bemused response: why study our private security industry? While this reaction is understandable today, the question remains: how did a business that was criminalized and politically contested only 30 years ago, and remains so in many post-Soviet states, become detached from high politics?

Estonia's private security market today features many small domestic firms, and a few larger international players. The Estonian Association of Security Companies (*Eesti Turvaettevõtete Liit*; henceforth, ETEL), the industry's main federation and advocacy organization, includes firms accounting for approximately 80% of the Estonian market. According to an unpublished Estonian-language report we received from ETEL, in 2016, the annual sales of all security firms in Estonia reached an all-time high of approximately 200 million euros, of which security, primarily guarding, services accounted for 44%, security technology was 28%, and the rest was other services. Estonia's security industry is one of the smallest in Europe in annual turnover, number of licensed guards, and companies.³ The largest multinational firm is G4S, which represents more than a quarter of total market volume (and more than 40% of 'security services'). In contrast, according to ETEL executive manager Andre Lilleleht, Estonian firms, such as Viking, which began as the security operation in the country's largest shopping centre, are 'freer to innovate', and occupy niches, such as parking enforcement, that international firms do not fill. In addition, as defined in national law and ETEL's advocacy, the industry excludes Estonia's most famous contribution to private security, the cybersecurity business, discussed below.

Estonian regulatory policies on security companies fall within the European mainstream. Lilleleht reported that as interwar Estonia did not have a private security industry, the restored republic created regulations from scratch. According to lore, the Finnish private security law, which served as a model, was brought from Helsinki in a Securitas carrier bag. As security provision that is also a business, private policing is regulated both through a 'Security Act', as well as through the 'Economic Activities Code', and indirectly by legislation on police and EU directives. In addition, unlike most other post-Soviet states, Estonia drew a clear legal distinction between private and public security. Whereas in many post-Soviet countries, the national police operate a paid policing service, according to Lilleleht, in Estonia, they may not do so.

Further limiting private security activities, companies may guard physical objects or protect people, but cannot undertake general policing duties in public spaces. Also, unlike Russia, but like most European countries, Estonia also prohibits private detective services (Dorn and Levi, 2007; Volkov, 2000). Some rural localities complain these policies lead to inadequate public police service and wish to retain private security. In addition, Estonian law also limits security companies' use of firearms: the company itself must be licensed to issue firearms to staff, and individual employees must also be separately licensed. According to Lilleleht and Sven Põierpaas, who heads the country's gun licensing committee, only a few companies, mainly large international ones, supply armed guard services.

In response, ETEL argues that with modest amendments to the Security Act firms could provide additional services without jeopardizing regulatory goals. ETEL's proposals dovetail with long-term goals identified in the Interior Ministry's 2018 'Internal Security Development Plan for 2020–2030', including safer public spaces, improved response times, and even demographic stability. According to Lilleleht, under one proposal, municipalities could contract with security firms to patrol public spaces using armed personnel. Eimar Veldre of the Interior Ministry told us in an interview that ETEL also argues that certain services, such as security audits, should be fully delicensed, while other regulatory functions, such as certifying security guards, should devolve from the Ministry of Education to ETEL. A further proposal would clarify the nature of the industry as an economic activity that performs public functions, reflecting the emphasis in Estonia's Roman-German civil law on conceptual precision.

Yet those who remember the business during the early 1990, such as Ramon Loik, a security analyst and former adviser to the Minister of Interior, recall the period as a 'Wild West'. In one especially grave incident, the Jäätters, a nationalistic Estonian volunteer militia, staged a rebellion, raising concerns about the state's monopoly of force (Smith, 2013: 84–85). Responding to social dislocations and an organized crime scene linked to Soviet security services, homicide and other violent crime rose dramatically (Saar, 2004: 506, 509). In addition, some former Soviet officers clashed with the predominantly ethnic Estonian Defence League (discussed below) (Smith, 2013: 84). According to Loik, most Soviet officers were ultimately dismissed or left public service (and often the country) voluntarily. These conflicts also implicated the nascent private security industry. Peeter Põlluveer, who ran the security department of the national railway in those years, recalled the nebulous line between firms providing security for payment, and organized crime groups compelling businesses and individuals to make protection payments, sell off property at fire sale prices, or offer preferential pricing. Early security companies threatened to supplant the police with violence (Hakala, 2012: 114–115).

In contrast to Estonia, the security industry in most other post-Soviet countries still features close connections with criminal structures and the state itself. In Russia, the early 1990s were marked by bloody wars between rival gangs enforcing protection rackets. Later in the 1990s, such mafia violence abated after some larger protection rackets consolidated under the security services (Volkov, 2002), although some small businesses still pay protection to local gangs (Stephenson, 2015). Public officials prey on businesses, sometimes on behalf of firms who pay them to harass competitors with labour law and tax inspections (Favarel-Garrigues, 2011; Gans-Morse, 2012). In addition, the so-called 'Guarding Police' of the Interior Ministry offer security services on the private market, partially crowding out private firms (Nallah et al., 2015). Similar police-controlled private security services exist in Ukraine (Hiscock, 2006) and Georgia (often lauded for its police reforms) (Hiscock, 2006; Lehmbuch and Sanikidze, 2014). Likewise, Russian private military companies controlled by Kremlin-linked oligarchs compete with senior military officers for control of defence policy (Marten, 2019). How did Estonian private security become a post-Soviet outlier?

Reconfiguring Estonian private security

After Estonia regained independence, the government consistently separated private security from politically suspect forces. Like Russia, independent Estonia inherited a 'guarding police' providing paid security services and headed by a senior KGB officer (Hakala, 2012: 114). However, unlike the post-Soviet countries noted above, as well as neighbouring Latvia, Estonia rejected police-led private security. According to Lilleleht, the executive manager of ETEL, because Estonia's 1938 constitution (restored on regained independence) did not permit public entities to provide private security, the 'guarding police' were swiftly privatized, a decision he termed key in the industry's later evolution. The authorities also rebuffed proposals from the industry to authorize security firms to conduct searches and arrests and carry weapons (Saar, 2004: 520), reinforcing the legal divide between private and public security.

As a related matter, most leading officials in the 'guarding police' were Russian-speakers. According to Lilleleht, some of these later left Estonia; others became involved in organized crime; and still others went into the new private security sector, although mostly not in managerial positions, where younger people with different skills were preferred. As a result, former guarding police were displaced from the new security industry. In addition, Lilleleht reported that while former KGB officials who registered as such were not barred from security firm ownership or employment, they were subject to investigation, and few now own companies. These policies segregated the industry from actors who might have constructed state-sponsored protection rackets or who displayed questionable loyalty to the regime, once again undermining Soviet legacy industries to create a new Estonian economic elite linked with the West.

In addition, law enforcement waged a successful struggle against organized crime. The early 1990s saw control of the underworld contested among Estonian-, Russian-speaking, and mixed organized crime groups, with mafia-related killings reaching a peak of nearly one a day in the 'bloody autumn' of 1994, calling into question whether the new republic could maintain order (Lill, 2012: 58). According to a Defence League official, Ilmar Raag, in the 1993 incident described above it was rumoured that the mutinous Jääger militia had aligned themselves with Estonian organized crime groups against Russian-speaking rivals. How did Estonia tame its criminal underworld? In an interview, Ramon Loik pointed to the controls on former KGB members and the establishment of new customs and revenue agencies unlinked from Russia, which choked off such cross-border connections. Such policies typify the 'situational' approach to transnational crime described by Kleemans et al. (2012), relying more on hardening public institutions than on draconian enforcement, as in post-Soviet Georgia (Slade, 2013). Thanks in part to such policies, since the 1990s, Estonia's criminal groups have become constrained, focusing more on cross-border smuggling and money-laundering than on protection rackets. In addition, they are largely disconnected from the Russian underworld, operating as 'project-based, economically motivated networks rather than strictly hierarchical and violent Soviet-like gangs with authoritarian leaders' (Lill, 2012: 54). In contrast, neighbouring Latvia's organized crime groups remain closely integrated with their Russian counterparts (Loik and Smith, 2015: 98). Thus, the decline of Estonia's mafias (in part from the voluntary emigration of their leaders, in part from deliberate policies)

removed actors who could have produced a more criminalized, politically threatening security industry.

In the same vein, while unlike the KGB the state police were not dismissed wholesale, they were vetted, and non-citizens were barred from employment (Police and Border Guard Act, 2009: section 38), thus promoting ethnic Estonians to management. Nonetheless, both public and private policing remain significantly staffed by Russian-speakers. According to Sergei Metlev, a Russian-speaking civic activist who volunteers as a 'police auxiliary', although few security firms are owned by Russian-speakers, younger Russian-speakers often work in the industry and volunteer as auxiliaries to prepare for public police careers. Metlev estimated that a quarter of police officers and half of private security employees are Russian-speakers. As noted, few observers see Estonia as the next Crimea, and the national security official and analyst Ramon Loik stated that Estonia's only existential threat is external. Yet while employment of Russian-speakers in the security industry evidently does not concern the government, ethnic Estonians' leading role in the industry likely makes it more politically acceptable.

As with other industries, the government permitted extensive foreign ownership of private security. The multinationals' prominence frustrates Estonian firms. The ETEL executive manager Lilleleht advocates regulatory liberalization to prevent 'foreign domination', although ETEL is not directly taking aim at foreign ownership per se. Yet this debate assumes that foreign ownership means *European* ownership—again, a desirable outcome because it vests control of security firms in politically acceptable (non-Russian) owners. In summary, all these policies—separating police and the private security industry, undermining organized crime, and supporting European and ethnic Estonian ownership—have placed the industry in politically reliable hands. Yet these policies were largely driven by geopolitical considerations in which the industry itself played a lesser role. To borrow a term from comparative politics, the 1990s and early 2000s fall of the USSR and Estonia's accession to the EU and NATO created a 'critical juncture' for Estonia's security industry, whose outcome still basically defines the industry today (Soifer, 2012).

Estonia's 'whole of nation approach' to security

In our interview, Eimar Veldre, then with the Interior Ministry, noted that Estonian legislation and official statements declare all citizens responsible for national security. Unlike most EU countries, Estonia retains universal military conscription for men (Military Service Act, 2012: section 2). However, Estonia's most distinctive innovation is the *Kaitselid*, or Estonian Defence League, an armed volunteer force whose civilian members train for military and civil defence and disaster-preparedness. According to Colonel Riho Ühtegi, commander of the Defence League, interviewed in Sildam (2019), the organization was established in the interwar period to repel a future Soviet invasion or internal insurrection. Disbanded under Soviet rule, it was re-established in 1990. During communist hard-liners' August 1991 attempted coup against Soviet President Mikhail Gorbachev, its members defended Estonia's parliament and broadcasting tower (Taylor, 2018: 172). Under the 2013 Estonian Defence League Act (§2(3)), it is

a public institution that promotes ‘the readiness of the nation to defend the independence of Estonia and its constitutional order’. The 2017 Emergency Act provides that it can be activated for order-maintenance and guarding during a state of emergency. According to Ilmar Raag, a senior Defence League commander, it numbers 17,000 to 20,000 volunteers (and a small paid staff), overwhelmingly male ethnic Estonians, although also including Russian-speakers and women. It enables an ‘intermediate level of response’ between police and military. While its personnel may not arrest civilians, in an emergency they can guard and control access to sites. Members drill with firearms and, unlike private security employees, may keep their service guns at home. The 2007 Bronze Soldier incident also catalysed the expansion of the Defence League, meant, as Veldre reported, to make Estonia a ‘harder target’ for Russia, preventing an easy sweep as in Ukraine’s Crimea in 2014. He also noted that as a large, centralized organization mobilizing the armed force of citizens, many with police training, it vastly eclipses the country’s fragmented and mostly disarmed security companies.

Likewise, Estonia’s liberal private gun ownership rules also marshal civilians for national defence. These policies contrast with both the Soviet Union and most other post-Soviet states, which remain highly restrictive, with few exceptions, such as Georgia (Light and Slonimerov, 2020). According to Põierpaas, chair of the national gun licensing committee, laws on gun ownership were enacted in 1991 and 2001. While long guns were permitted for hunting in the USSR, Estonia’s 1991 law was probably the first in a post-Soviet state to authorize civilians to possess short-barrelled handguns for self-defence. In contrast to some European countries, Estonians may also possess semi-automatic weapons, although fully automatic ones are reserved for the Defence League. As Põierpaas told us, these policies reflect public demands for self-defence during the 1990s ‘cowboy’ period. Nonetheless, ownership regulations involve a demanding skills test and storage requirements and a mandatory registry. Some 30,000 individuals are licensed to own one or more firearms. In addition, 10 firms, including the Estonian National Bank and several large security firms, are licensed to issue them to staff, with approximately half of all security employees in the country authorized to use guns.

While Estonia has tightened some regulations based on EU directives since its 2004 EU accession, as with the Defence League, broadly liberal gun policies entrust citizens with security, thus repudiating the Soviet regime’s distrust of popular initiative, and affirming that Estonia is a defensible state. As Põierpaas put it, ‘Now the state trusts people, albeit with laws. People who follow the laws are welcome to do so, and those who don’t will be caught.’ As of writing, the government was considering marshalling the country’s gun owners into civil defence through the ‘Swiss model’ of military reservists holding their guns at home, and possibly arming more police officers and auxiliary police. Thus, as with the Defence League, liberalized gun ownership reduces the political salience of private security.⁴

In addition, particularly since the 2007 cyberattacks, the Estonian government prioritizes domestic and international cybersecurity, ranking first in Europe and third in the world in the International Telecommunication Union’s (2021) cybersecurity index. Estonia’s public innovations have also stimulated advanced private and academic cybersecurity sectors. Estonian firms specialize in security, including cryptography and

blockchain technology, and multinational cybersecurity firms such as Symantec and Malwarebytes have offices in Tallinn. As with other aspects of security, a ‘whole of nation’ approach applies: indeed, the Defence League includes a special ‘Cyber Defence League’. Estonian firms’ cybersecurity ‘brand’ thus recalls O’Reilly’s (2010: 195) Israeli security consultancies, whose counter-terrorism branding is based on cooperation with their military and intelligence services.

Yet Estonia’s security industry is not part of this cybersecurity network, since as noted, the Security Act authorizes private security to safeguard only objects or persons. In contrast, the website of the Confederation of European Security Services, representing the national associations of 34 European countries including ETEL, counts cybersecurity among the private security businesses it represents.⁵ Unlike the Europe-wide confederation, ETEL has not sought to enter the cybersecurity market, although its executive manager, Lilleleht, speculated that proposed amendments to the regulation of security audit services might open this door. While other Estonian private security actors see cybersecurity as a potential growth area in an otherwise stagnating market, he suggests that guarding tech companies themselves (not cyberspace) will net more revenue. This exclusion of private security from the cybersecurity sector thus reflects the choice of the industry elite to prioritize public order maintenance.

In contrast, Estonia’s central role in NATO’s Cooperative Cyber Defence Centre of Excellence shows how its government has fostered cybersecurity in the public sector. Even before the 2007 cyberattacks, Tallinn was the planned location of the Centre of Excellence (Stoicescu, 2021). The separation of the private security and cybersecurity sectors reflects an implicit official distinction between cybersecurity and private security. On the European level, the creation of a NATO institution points both to continent-wide concerns about Russian-backed cyberattacks and the need for an alliance strategy, and to disagreements among European states about the political significance of private security, as noted above, thus compelling a *public* response. On the domestic level, the contrast between the boxed-in and fully privatized Estonian security industry and the explosive growth and private–public hybridization of cybersecurity demonstrates how the broader security ecosystem shapes private security. While the Estonian government promotes cybersecurity for national security reasons, the (conventional) private security industry receives limited official attention because other security actors perform functions the state regards as more important. Over time, the modest activities of Estonian private security may also influence what people go into this field, perhaps in turn limiting the Estonian security industry’s collective aspirations.

To review, the private security industry has been politically neutralized by macroeconomic and regulatory decisions, most of which were not adopted with private security in mind but nonetheless shaped the industry and prevented it from becoming criminalized, corrupt, or linked to hostile foreign powers. In addition, policies promoting a comprehensive security ecosystem have limited the industry’s significance in Estonian society, so that regulatory debate is limited to fine-tuning. We now return to our broader question, how do threats to regime survival influence the development of private security?

The political significance of private security

As noted, even in the Anglosphere countries that dominate the literature, private security symbolically undermines the Westphalian state's supposed monopoly over coercion. Thus, debates over anchored pluralism (Loader and Walker, 2001, 2006, 2007) and nodal governance (Johnston and Shearing, 2003; Wood and Shearing, 2007) address the political sensitivity of the private security industry in established liberal democracies of the Global North. And as White (2012) argues, theory would advance if hitherto separate lines of inquiry on political and economic context were integrated into a 'new' political economy of private security.

This case study of Estonia, whose private security industry has been shaped by Soviet occupation and the Russian threat, directs attention to such 'external' forces. While studies to date recognize that markets for security products reflect regional and global economic patterns, they focus on domestic economic forces. Likewise, while the literature recognizes geopolitical factors such as the Westphalian state system, most studies focus on 'internal' or localized political contexts of private security. Our findings indicate that theories should also address the interplay of political and economic forces, both domestic and international, which are often not well captured within the dominant Anglo-American analyses of private policing (Kempa and Singh, 2008).

When we began this inquiry, we expected to find that Estonia's significant geopolitical challenges would lead its government to direct the development of its private security sector closely. Instead, we found a lightly regulated industry of modest size and ambitions. Our investigation then yielded a modified analysis, namely that Estonia's national security environment and international politics structured the country's post-independence institutional design and regulatory decisions, and thus indirectly led to specific industry outcomes. Estonia's security industry in the 1990s resembled analogous industries in other post-Soviet countries—connected to state coercive institutions and criminal organizations—whereas today it resembles the security industry in established Western European liberal capitalist regimes—occupying a defined, lawful niche providing limited forms of security. Many policy decisions ultimately concerning Estonia's relations with Russia and other external actors jointly produced this outcome, illustrating how high politics influences private security, albeit often indirectly and all but invisibly.⁶

Consistent with this special issue, our inquiry also reveals how the kind of private security sector familiar from studies of Global North countries gradually emerged in Estonia. Drawing on the concept of *processes*, or 'combinations and sequences of mechanisms that produce some specified outcome' (Tilly, 2007: 23), we can identify two such processes that together transformed Estonia's post-Soviet private security from a contested aspect of high politics, into a limited and regulated private industry. These processes were, first, the political neutralization of private security; and second, its embedding in related security institutions and practices, which reduced its importance for regime survival. While cautious about making broad generalizations based on one case study, we tentatively suggest that these processes have likely unfolded across most or all Global North countries at some point, although presumably in differing proportions. (For example, as noted, Estonia has created a more vigorous civil defence sector than most other European states.) As a counterfactual, a private security sector still

closely linked to the Estonian police or intelligence services, let alone to their Russian counterparts or to a flourishing cross-border organized crime milieu, would have elicited more official concern.

The absence of these destabilizing phenomena is now taken for granted in Estonia precisely because of earlier policy choices (as per Abrams and Fish, 2015) that created robust security practices and institutions and thus made private security relatively unimportant. As a result, the Estonian private security industry now plies its modest trade without much official attention. Furthermore, as Button (2008: 112) recounts, in the United Kingdom, the argument that private security was like any other business underpinned resistance to regulation. Estonia's post-independence travails with security, still within living memory, belie this fancy. Rather, Estonia illustrates the structuration of private security through policy decisions and external circumstances that create opportunities for entrepreneurial activity. Granted, one should be cautious about creating typologies of national private security industries: policy *debates* are often surprisingly similar across countries, so that differing policy *outcomes* reflect a high degree of contingency (Leloup and White, 2021). With that caveat, we nonetheless expect that at a high level of generality Global North countries' security industries *do* broadly resemble one another, reflecting their similar long-term structuration, whereas they differ systematically from security industries in the Global South. For example, as in Mexico (Puck and White, 2021), the generally lower legitimacy of public police in Global South countries likely impedes an Estonian-style private–public security ecology.

Our inquiry also yields methodological implications. First, while Estonia's security industry now resembles those of other wealthy European democracies, analysing the industry's contemporary form proved less revealing than asking how it diverged from its post-Soviet neighbours. In turn, this points to the need to use new cases to generate new theories, not just test earlier theories (Singh and Light, 2019). Rather than asking, for example, whether the 'mass private property' hypothesis accounts for private security growth outside Canada and the United States, non-Global North contexts can generate different questions altogether. In particular, the nodal governance vs. anchored pluralism debate in Anglo-American and some EU countries (Dorn and Levi, 2007) does not apply in Estonia. There, the legacy of Soviet occupation is rejection of state monopolies, such that private security can only be regulated like a business; paradoxically combined with a 'whole of nation approach' to national security that includes the industry as well as civil society, the public sector, and individuals. As a corollary, it is also important to look beyond current debates. Thus, longitudinal analysis reveals that the issues still 'on the table' in Estonia, such as proposed expansion of private security into rural law enforcement, or how security fits into Roman-German civil law, are less significant than the more fundamental debates that are already resolved.

Other subsidiary questions concern the role of policy diffusion, ideology, and legal culture. As noted, Estonia's legislation on private security was modelled on a Finnish statute. Given that Finland's proximity, political support, and investment promoted many aspects of Estonia's post-Soviet transformation (Taylor, 2018: 176, 185), it is unsurprising that Finland also influenced private security. Yet although policy diffusion figures in some criminological literatures (e.g. on prisons), studies of private security neglect it. Likewise, Estonia's Roman-German civil law tradition, with its emphasis on

nested conceptual categories, ostensibly complicates private security regulation. In contrast, the paradigmatic cases of private security all follow the English Common Law tradition. How much do such ideational factors influence private security regulatory outcomes?

While others could explore these questions further, our findings suggest that national security priorities influence private security more than policy transfer or legal culture; and as a corollary, that industry-specific statutes exert a secondary influence on the industry, not a primary one. Thus, the influence of the Finnish statute on Estonia's security industry concerns specific policy details in the Security Act, rather than the broad structural features analysed here. Likewise, while legal traditions may influence policy at the margins, the industry's broad contours instead reflect political decisions made in past 'critical junctures'. For example, like Estonia, Austria also features Roman-German law. Yet Austria's current highly centralized policing model, which strongly constrains the private security industry and even local public police, results from policy decisions after the Second World War in response to the role of private militias in 1930s political turmoil, not from Roman law doctrines (Terpstra, 2017). Indeed, most European states feature legal systems based on Roman law, so that this shared legal inheritance logically cannot explain differences in their private security industries.⁷ In the same vein, while Estonia's libertarian zeal is not in question, it is also highly confounded with the geopolitical motivations that seem to have directly influenced Estonia's private security development. Thus, our study suggests that abstract ideological beliefs explain relatively little about private security outcomes (at least among industrialized democracies). In contrast, based on our findings concerning the impact of the EU on Estonia's security industry both before and since its 2004 accession, future studies could profitably explore how regional blocs and alliances influence public and private policing.

Our inquiry also yields policy implications for countries outside the Global North seeking a regulatory framework for private security consistent with a liberal regime. Rather than initially focusing on highly specific rules, such governments should first set basic parameters for the industry to ensure that it does not develop into an official extortion racket or a branch of organized crime. In this respect, Estonia's focus on improving public institutions—in particular, by keeping state police out of private security and improving customs and tax enforcement—now appears prescient. (Of course, the country also enjoyed distinctive advantages in the institutional design process, such as the prospect of EU membership, as well as the departure abroad of organized crime bosses and ex-KGB officials.) In closing, our study of Estonia suggests that the shape of private security is more determined by underlying public security priorities of the national regime, than by regulations specifically governing the industry itself.

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Notes

1. We will be happy to provide copies of unpublished Estonian sources and translations from the Estonian on request.
2. For example, to (re)assert sovereignty over public order, some EU states made nationality a requirement to own or operate guard services, a regulation later overturned by the European Court of Justice on free-market grounds (Dorn and Levi, 2007: 214, 217).
3. According to the Confederation of European Security Services (2019), in 2015 Estonia had 290 private security firms, the top five of which represented 93% of market share; 13,234 licensed guards; and an annual turnover of 170 million euros.
4. Of course, arming civilians raises the question of *which* civilians can be trusted with arms: while the Defence League commander Raag questioned some primarily Russian-speaking gun clubs' loyalty, the gun licensing Commission Chair Põierpaas discounted such concerns.
5. The Confederation does exclude private military companies from its membership, recalling the segregation of the private security and private military sectors noted above. See www.coess.org (last accessed 1 September 2021).
6. O'Reilly's (2010) 'transnational security consultancies', which emerge directly out of the activities of related military and intelligence institutions, represent interesting exceptions to this statement. Such firms occupy a unique market niche that is closely linked to high politics and thus differs radically from that of domestic private security firms.
7. In contrast, some sociolegal scholars of communism argue for a relative autonomy of law. For example, Şerban (2019) finds that Roman law doctrines and lawyers' professional communities significantly influenced legislation on private property under Romania's communist regime. Perhaps (per Şerban) legal traditions influence actual statutes more than they do the non-legal outcomes of interest here.

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Appendix I: Interviews

Interviewees are listed in alphabetical order and identified by their relevant positions or experience. Interviewees marked with an asterisk (*) spoke in Estonian, interpreted by Gold. All other interviews were conducted in English. All interviews were conducted in Tallinn, Estonia, in 2019.

- *Lilleleht, Andre. Executive Manager, Estonian Association of Security Companies (Eesti Turvaettevõtete Liit), 14 October and 21 October.
- Loik, Ramon. Research Fellow at International Centre for Defence and Security and former adviser to Minister of Interior, 17 October.
- Metlev, Sergei. Freelance journalist, community activist, and auxiliary police officer, 18 October.
- *Põierpaas, Sven. Former police officer, Interior Ministry legal advisor on firearms, and chair of firearm licensing commission, 22 October.
- Põlluveer, Peeter. Entrepreneur, former head of security for Estonian National Railway, 19 October.
- Raag, Ilmar. Documentary filmmaker and head of unit, Estonian Defence League, 15 October.
- Veldre, Eimar. Adviser, Public Order and Criminal Policy Department, Interior Ministry, and auxiliary police officer, 15 October.

Appendix 2: Estonian laws and policies

- Security Act, 8 October 2003: available at: <https://www.riigiteataja.ee/en/eli/505032019001/consolide> (last accessed 9 August 2021).
- Police and Border Guard Act, 6 May 2009: available at: <https://www.riigiteataja.ee/en/eli/ee/511112019003/consolide/current>.
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