CHARLES UNIVERSITY

FACULTY OF SOCIAL SCIENCES

Institute of Political Studies

Department of Security Studies

Master's Thesis

2018   **Zuzana Buroňová**

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An Analysis of Counter-Terrorism Strategies in Indonesia and Saudi Arabia

Master's thesis

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Year of the defence: 2018

Declaration

1. I hereby declare that I have compiled this thesis using the listed literature and resources only.
2. I hereby declare that my thesis has not been used to gain any other academic title.
3. I fully agree to my work being used for study and scientific purposes.

In Prague on 30.4.2018   Zuzana Buroňová

References

BUROŇOVÁ, Zuzana. *An Analysis of Counter-Terrorism Strategies in Indonesia and Saudi Arabia.* Praha, 2018. 86 pages. Master᾽s thesis (Mgr.). Charles University, Faculty of Social Sciences, Institute of political Studies, Department of Security Studies, Supervisor PhDr. Vít Střítecký, M.Phil., Ph.D.

Length of the thesis: 131 232 characters

Abstract

This thesis is focusing on counterterrorism policies that are used in Indonesia and Saudi Arabia. Because of the limited research on the counterterrorism in non-Western world, this thesis decided to contribute to this research and widen literature on this issue. It first introduces the term terrorism and analyses the counterterrorism models (criminal, war and disease models), which can be found mostly in Western literature. It includes critique of these models and attempt to create an alternative one, because it finds the current models unsuitable even for the Western counterterrorism policies. Besides that there is also introduction to other counterterrorism strategies such as terrorist financing and a subsection on deradicalization that is important part of counterterrorism as well. Then the thesis focuses on two parallel case studies of Indonesia and Saudi Arabia. It examines counterterrorism policies of both of them. The thesis first introduces the countries character, threats they are facing and attacks they have experienced and then analyses what measures are used to fight terrorism. After analysing all aspects of their counterterrorism efforts – legislature, cooperation, deradicalization, military methods etc., the alternative model is applied on each case to see if it is suitable for non-Western counterterrorism policies also.

Abstrakt

Tato diplomová práce se věnuje protiteroristickým strategiím, které jsou používány v Indonésii a Saudské Arábii. Jelikož je výzkum soustředící se na protiteroristické strategie v nezápadním světě omezen, je cílem této diplomové práce přispět k rozšíření tohoto výzkumu. Práce nejprve představí pojem terorismus a analyzuje protiteroristické modely (kriminální, válečný a zdravotní model), které jsou k nalezení hlavně v Západní literatuře. Práce obsahuje I kritiku na tyto modely a pokus vytvořit model alternativní, jelikož ty současné jsou shledány nedostatečné i pro Západní protiteroristické snahy. Také je zde zaměření na další protiteroristické strategie jako například boj proti financování terorismu a sekce na deradikalizaci, která je take významnou součástí protiteroristických strategiíí. Dále se diplomová práce soustředí na dvě paralelní případové studie Indonésie a Saudské Arábie. Práce zkoumá jejich protiteroristické strategie. Nejprve představí character zemí, hrozby jakým čelí a útoky, které proběhly na jejich území a poté analyzuje opatření použitá v boji proti terorismu. Poté co analyzuje všechny aspekty jejich protiteroristických snah – legislativa, spolupráce, deradikalizace, vojenské metody atp., je na obě země aplikován alternativní model, aby práce zjistila, zda je vhodný i pro nezápadní země.

Keywords

Counter-terrorism policies, Indonesia, Saudi Arabia, terrorism, counter-terrorism models

Klíčová slova

Protiteroristické politiky, Indonésie, Saudská Arábie, terorismus, protiteroristické modely

Title

An Analysis of Counter-Terrorism Strategies in Indonesia and Saudi Arabia

Název práce

Analýza protiteroristických politik v Indonésii a Saudské Arábii

Acknowledgement

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Introduction

Terrorism is a much-discussed issue in the 21ˢᵗ century. Especially since the attacks on New York and Pentagon on September 11th, 2001, terrorism is seen as one of the most dangerous threats we are currently facing. Even though it is so widely discussed and there are many conferences and scholarly works on this topic, we still do not understand it very well and there is even no common definition of terrorism. Most of these works and discussions focus on terrorism in Western world – the transatlantic area- and the rest of the world is often left out. Although I do not mean to say that there are no works dealing with terrorism in the non-Western world, they are under-presented and most of the knowledge is about Europe and the United States. This is especially true when we talk about counterterrorism measures. There may be works on terrorism in the Middle East because it is often connected to our (Western) security (especially when talking about groups such as the al-Qaeda or Islamic State), however there are much less works concerned with the strategies that Middle Eastern countries use to fight terrorism. This is the reason why this thesis will contribute to the efforts to widen this limited literature and will focus on the counterterrorism strategies in non-Western areas which will be analysed in two parallel case studies – Indonesia and Saudi Arabia.

Background

The 9/11 brought more attention to terrorism but it would be wrong to say that before this date terrorism did not exist. It did, and it was present in both Western and non-Western countries. For instance, al-Qaeda´s roots go as far as Soviet war in Afghanistan and it was formed in 1988 from the rebels fighting the Soviet invasion there.[1] In Europe there was operating terrorist groups IRA and ETA and in the Middle East there were

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[1] Paul Ashley, *The Complete Encyclopedia of Terrorist Organisations* Concise Edition, 2011, Casemate:Philadelphia, p. 89.

also Palestenian and Izraeli terrorist groups. Even before that, at the beginning of the last century, anarchist terrorism existed – for example in Russia.[2]

There is debate about qualitative change in terrorism after 9/11 and that even though it was present even in past; it is more brutal and dangerous now than was ever before. One of the scholars who do not agree with this change in the character of terrorism is Martha Crenshaw [3] She believes that the old terrorists goals, methods and even structure is not different from the new terrorist organisation. She argues that not all of the old terrorist groups were discriminatory in their targets, that not all of them had sensible negotiable goals and that not all of the new groups have network organisation (actually, al-Qaeda was the only one at the time Crenshaw wrote her article), she demonstrated that the difference between old and new terrorism is less significant than some scholars believe it to be. Others who share this believe are Sebastian Jäckle and Marcel Baumann.[4] They found out that the growth in suicide bombings and number of beheadings can be the only two distinctions that can make the new terrorism to appear as more brutal. Besides that there was no increase in attacks or fatalities caused by terrorist groups and not even increase in attacks on soft targets.

Counterterrorism efforts were also limited prior to 9/11 compared to today's efforts. United States dealt with terrorism prior to the September 11 attacks mostly through criminal justice and not its war model (that will be described later in the thesis).[5] NATO also did not focused on terrorism as its priority prior to 9/11 when it did invoke the

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[2] Luigi Bonanate, *Mezinárodní Terrorismus*, Columbus,1994, překlad Josef Hajný, 1997
[3] Martha, Crenshaw, "'New' Vs. 'Old' Terrorism: A Critical Appraisal," In *Jihadi Terrorism and the Radicalization Challenge in Europe*, edited by Rik Coolsaet, Aldershot: Ashgate Publishing Company, 2008, pp. 25-36.
[4] Sebastian Jäckle & Marcel Baumann. "New terrorism" = higher brutality? An empirical test of the "brutalization thesis", Terrorism and Political Violence (2015) e-first version.
[5] Michael Chertoff, "9/11: Before and After," Home and Security Affairs, September 2011, accessed February 9, 2018, **https://www.hsaj.org/articles/584**.

article five for the first time in its history. [6] The European Union, as well, increased its counterterrorism efforts after 9/11 and, for instance, introduced European Arrest Warrant that was controversial prior to these terrorist attacks,[7] or it revised some measures of the criminal system that some states found not sufficient for fighting terrorist threats anymore.[8] Terrorism financing also received more attention than it had in the last century.[9]

Goals

The goal of this thesis is to answer two research questions. The first one - Which counterterrorism strategies do Indonesia and Saudi Arabia apply? and the second one is – To what extent are the concepts of the Western counterterrorism models suitable for non-Western countries?

As was mentioned in the first part of the introduction, counterterrorism in non-Western areas is much less explored than terrorism in Europe and United States. This is the reason why I focus on Saudi Arabia and Indonesia, two Islamic countries outside of Western area – one in the Middle East and the second in the South East Asia. Both Countries have experience with terrorism and are well suitable cases for counterterrorism analysis. There is already one work comparing "anti-terrorism" in Indonesia and Saudi Arabia, however it is different from the goal of this thesis. It focuses mostly on the terrorist history in each country, on its countering terrorist

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[6] „Countering Terrorism," NATO, December 19, 2017, accessed February 9, 2018, https://www.nato.int/cps/ua/natohq/topics_77646.htm.
[7] Oldřich Bureš, "European Arrest Warrant" in *EU Counterterrorism Policy: A Paper Tiger?* Burlington, USA: Ashgate 2011.
[8] Elshpeth Guild, " The Uses and Abuses of Counter - Terrorism policies in Europe: The Case of the „Terrorists Lists," *Journal of Common Market Studies* 46, no. 1, January 2008, pp. 173-93.
[9] Oldřich Bureš, "EU´s Fight Against Terrorist Financing" in *EU Counterterrorism Policy: A Paper Tiger?* Burlington, USA: Ashgate 2011

financing efforts and its cooperation with other countries,[10] not on a more holistic understanding of their counterterrorism measures as this thesis does.

Besides analysis of counterterrorism in two particular non-Western countries it is also important to examine whether the often used Western models of counter-terrorism are even suitable for non-Western countries and can be used there or if it is more appropriate to use another strategies.

Methodology and data

The thesis will use parallel case studies, the methodology that is the most suitable to the character of the chosen case studies. Saudi Arabia and Indonesia are very similar in some aspects – they are both Sunni Islamic countries, both experienced terrorist attacks, both have terrorist cells on their soils – but very different in others – Saudi Arabia is a monarchy while Indonesia is democratic country, they experience different kind of terrorism, have different vision about cooperation with West – so it would be inappropriate to use comparative analysis, and parallel case studies are the best fitting to the character of the thesis.

 The counter-terrorism strategies used in these countries will be analysed by looking at the character of the strategies that they are using and the form they take in these countries, the institutions engaged in counterterrorism, cooperation with other countries, etc. The beginning of each case study will also introduce the kind of terrorist threats faced by these countries - what types of groups are operating on their soil and how many attacks, and how deadly, did they experienced.

Data for empirical part will be used primarily from the Global Terrorism Database, which include information about each terrorist attack committed in a given country,

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[10] Ali Ashraf, „Transnational Cooperation on Anti-Terrorism: A comparative case study of Saudi Arabia and Indonesia, *Perceptions*, Summer-Autumn 2007.

information about perpetrator, injuries and fatalities as well as place of terrorist attacks. The limitations of this database are that it counts every attack as one individual, so for example 9/11 would be included as four attacks, and thus may make the real number of terrorist attacks higher than it actually is. Another problem is that it also does not include data for 2017 yet so the analysis will be only until the end of 2016. Other sources will include websites describing particular terrorist groups and their goals etc. such as the Counter Extremism Project website and this will include also some news, for instance BBC. The information about counterterrorism strategies, institutions, projects etc. will be based mostly on academic literature and official sources of Indonesian and Saudi Arabian governments. For the theoretical part, this thesis will use academic articles dealing with different counterterrorism methods, definition of terrorism etc. This academic literature will include, for example, work of scholars such as Martha Crenshaw, Oldřich Bureš or Matt Qvortrup.

Case Selection

This thesis, as already mentioned, will analyse counterterrorism in Indonesia and Saudi Arabia. These countries were selected for several reasons, some of them already described above. First of all, they are both non-Western countries, which was important since the main idea of this thesis is to focus on terrorism outside Western world that is unlike non-Western world well described.

Second reason was that both of these countries are Islamic. Islamic terrorism seems to be the most visible and most focused on in today´s terrorism and counterterrorism debate so this thesis decided to focus on this area as well and analyse how is terrorism dealt with in two Islamic countries – however it is important to say that while Islamic terrorism will be the main focus and is the reason why these countries were selected, in

the case of Indonesia there are also cases of separatist terrorism and even though it is the country with biggest Muslim population, Islam is not the only allowed and official religion there. It is important to mention that these two countries are both significant in Islamic world – Indonesia is the biggest Muslim country and Saudi Arabia is the birthplace of Islam and has the two holly places on her soil – Mecca and Medina.

Third reason for the selection of these two countries is their similarity in some aspects. For example, that both of them are Sunni countries. Both of them also experienced major attacks on their soil and have terrorist groups present on their soil. Because both of them are Muslim they have some similarities in their counterterrorism methods – deradicalization plays a major role there, because they have Muslim figures that are seen as more legitimate for religious discussions with terrorists.

Even though there are also some differences – explained in the subsection on methodology above, these similarities were crucial in the case selection for this thesis.

Structure of the Work

The theoretical part of this thesis will first focus on definition of terrorism, because in work dealing with counterterrorism strategies it is important to first explain against what are these strategies used.

In the next section of the theoretical part, the thesis will focus on counterterrorism on more general level and introduce different measures used by governments fighting terrorism. In the other section there will be focus on the three counterterrorism models – the war model, criminal model and disease model. After introducing all of these models there the thesis will focus on their critique.

The next section of theoretical part will focus on deradicalization as a further step of counterterrorism, because deradicalization does not focus only on getting terrorists to give up their violent methods but also their radical views.

In the last section of theoretical part the thesis will create, based on the knowledge of the debates introduced in previous section, alternative type of counterterrorism that will be later applied on Indonesia and Saudi Arabia.

The empirical section will analyse counterterrorism methods in Indonesia and Saudi Arabia. The first chapter of empirical part will deal with Indonesia. It will first introduce the threats that Indonesia faces – the attacks it experienced and terrorist groups that are active on her soil. Another subsection will deal with counterterrorism methods that Indonesia uses – what strategies, what kind of institutions, cooperation etc. In the last subsection on Indonesia the thesis will apply the alternative counterterrorism model from theoretical part on Indonesia. The second chapter of empirical part will be consisted identically and will deal with Saudi Arabia.

Then will follow a concluding section, where I will summarize my findings about counterterrorism in Indonesia and Saudi Arabia and answer the research questions.

1. Theoretical part

1.1. Definition of Terrorism

Before focusing on counterterrorism strategies, it is essential to introduce terrorism first.
There is no universal definition of terrorism even today because states and other actors
of international system are not able to agree on what terrorism is. It is very subjective
term[11] and is often used to label ones´ enemies[12] – for instance for United States al-
Qaeda is a terrorist group while for al-Qaeda the United States are the real terrorists.
The problem is also to distinguish terrorism from other form of political violence such
as guerrilla war. The subjectivity is also apparent in the difference of labelling attacks as
terrorist or non-terrorist depending on the geographical area they occurred – the further
from us, the more neutral label.[13] The problem of consensus is often related to different
views on freedom-fighting, state-sponsored terrorism or the anti-colonial uprisings.[14]

Even though there is no common definition of terrorism that everyone would agree
with, there are some parts of definition that are mention more often. These are the
psychological aspect of terrorist acts and the intention to create fear, or the fact that
people who die or suffer injuries in terrorist attacks are not the primary victims but
should serve only to spread message of fear and put pressure on governments.[15] Another
often mentioned part of definition of terrorism is the political purpose of terrorist
groups.[16]

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[11] Anthony Richards, „Conceptualizing Terrorism," *Studies in Conflict &Terrorism* 37, 2014, p. 214.
[12] Leonard Weinberg, Ami Pedahzur and Sivan Hirsch-Hoefler, „The Challenges of Conceptualizing
Terrorism," *Terrorism and Political Violence*, 16:4, 2004, p. 778.
[13] Weinberg, Pedahzur and Hirsch-Hoefler, „The Challenges of Conceptualizing Terrorism," pp. 778-779.
[14] Sudha Setty, „What´s in a Name? How Nations Define Terrorism Ten Years After 9/11," *UNIVERSITY
OF PENNSYLVANIA JOURNAL OF INTERNATIONAL LAW*; FAL 2011, 33:1, pp. 9-10.
[15] Richards, „Conceptualizing Terrorism," pp. 221-222.
[16] Weinberg, Pedahzur and Hirsch-Hoefler, „The Challenges of Conceptualizing Terrorism," p. 782.

The importance of having a universally agreed on definition is that it can make the cooperation among state in fight against terrorism easier.[17] Not having the definition causes risk of states interpreting terrorism in their own ways, using it flexibly based on their own interest to label "terrorist" anyone uncomfortable for them.[18] Anthony Richards writes that:

"the concept has indeed been available as a "free for all" label for any actor who wishes to denounce the activities of their political adversaries for as long as there is no general conviction as to what terrorism really means or what its parameters are."[19]

1.2. Counterterrorism

Counterterrorism is very complex and consists of many different strategies. These include for example intelligence or countering terrorist financing and also cooperation with other countries is important part of it. These various methods were connected into three terrorist models – the criminal model, war model and disease model - that will be introduced in the next subsection. This subsection will thus describe only methods not fully fitting into one of these models, practices such as detention, arrests, targeted killing and others will be introduced in the next subsection as part of the models.

1.2.1 Counterterrorism Methods

When focusing on terrorists´ financing politicians believe that terrorism needs financing for its activities and if they want to stop them they have to simply take away terrorists´

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[17] Richards, „Conceptualizing Terrorism," pp. 213-214.
[18] Ibid., p. 214.
[19] Ibid., p. 215.

financial resources, so they are unable to continue in their operations. Besides that, tracking terrorist financial operation is also useful form of intelligence that can help uncover terrorist cells.[20] The fight against terrorist financing is taking place on various levels. United Nations adopted documents dealing with terrorist financing:

"the 1999 Convention against the Financing of Terrorism arguably represents the most important UN contribution as it sets out duties on states to impose "due diligence" requirements for financial institutions and reinforces states´ obligations to cooperate in mutual legal assistance, as regards, in particular, the tracing, freezing and confiscation of assets," and "UN SCR 1373…which among other things explicitly obliges all UN MS to criminalize acts of financing of international terrorism, and of making available funds to terrorists, as well as to freeze funds and other financial assets of persons and groups engaged in terrorist activities." [21]

European Union is an example of another organization that deals with fighting terrorists´ financing. It creates list of people who are suspected of terrorist activities or links to terrorist groups and EU froze their assets.[22] There is also The Financial Action Task Force – the non-governmental body that deals with money laundering or terrorism financing. It also sets a body of recommendations that should help states to effectively fight terrorist finances.[23] You can find these recommendations in appendix.

Another important method in counterterrorism is gathering and sharing intelligence that is important for almost all of the other strategies. It is necessary to have information for arresting terrorists, attacking their safe havens as well as for disrupting their

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[20] Bureš, "EU´s Fight Against Terrorist Financing" in *EU Counterterrorism Policy: A Paper Tiger?* pp. 173-174.
[21] Ibid., p. 176.
[22] Guild, " The Uses and Abuses of Counter - Terrorism policies in Europe."
[23] "Who we are," FATF, accessed February 12, 2018, http://www.fatf-gafi.org/about/.

financial sources and other activities. The heads of intelligence services of all EU member states, Norway and Switzerland meets in the "Club of Berne" to share intelligence.[24]

The intelligence approach also caused the increase of security cameras – CCTV (closed-circuit-television), which should enable the authorities to watch what is happening on the streets and keep them safe.[25] Another approach is the close cooperation between public and the police which can provide police with information directly from concerned community.[26]

The intelligence is also connected to travelling when biometric information are collected about each traveller to confirm that nobody is on terrorist watchlist and everybody presents their true identities.[27] This is also connected to ethnic/religious screening when the information about travellers´ (and not only travellers´) religion or ethnicity may be used to further screening because authorities (based on some previous information) consider (not always rightfully) these people to be of more risk to the country.[28]

Cooperation with other states is also very important part of counterterrorism The cooperation is taking place for example on level of EU, NATO, the Club of Berne, and UN so it is not limited only to Western countries. It includes also Afghanistan, Pakistan

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[24] Keohane, Daniel. *The EU and counter-terrorism*. Center For European Reform Working Paper, May 2005, p. 30.

[25] Matt Qvortrup, "Counting the Cost of Counterterrorism," *Terrorism and Political Violence*, 28:5, 2016, p. 973.

[26] *Preventing Terrorism and Countering Violent Extremism and Radicalization that Lead to Terrorism: A Community-Policing Approach*, OSCE, Vienna:2014, pp. 82-84.

[27] "What To Do? A Global Strategy," in *The 9/11 Commission Report*, National Commission on Terrorist Attacks upon the United States, 2004, pp. 361-385.

[28] Nick Adams, Ted Nordhaus and Michael Shellenberger, "Counterterrorism since 9/11 Evaluating the Efficacy of Controversial Tactics," The Science of Security A project of the Breakthrough Institute, Spring 2011, pp. 23-27.

or Saudi Arabia who have been cooperating with Western powers in the fight against terrorism. [29]

Another form of cooperation is the global coalition that is fighting against Islamic State in Iraq, Syria and also other regions. This coalition involves seventy-five countries from various regions of the world, which are committed to fight the IS. [30] This coalition was established in September 2014 and is committed not only to military means to defeat Islamic State but also to countering its financing, preventing new recruits from entering the IS, countering IS´s propaganda etc.[31]

1.3. Counterterrorism Models

The literature recognizes three counterterrorism models – the criminal model, war model and disease model. They differ in a way in which they are looking at terrorism and what it is[32]. In theory, criminal model sees terrorism as crime and thus stress the need of law in dealing with it, war model sees terrorism as act of war and thus adopts war strategies and the disease model sees terrorism as disease and takes some analogies from medicine to deal with this phenomenon. All of these models will be analysed in more detail in this section.

1.3.1. The Criminal Model

The Criminal model sees terrorism as a crime and deals with it mostly through the criminal system. This model is mostly typical for European countries. The main force who is responsible for fighting terrorism is police who must catch the criminals and put

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[29] "What To Do? A Global Strategy," pp. 367-374.
[30] The Global Coalition to Defeat ISIS: Partners," U.S Department of State, accessed February 20, 2018. https://www.state.gov/s/seci/c72810.htm.
[31]Global Coalition, accessed February 20, 2018, http://theglobalcoalition.org/en/mission-en/.
[32] Oldřich Bureš, Terrorism and Counterterrorism in *ROUTLEDGE HANDBOOK OF SECURITY STUDIES*, edited by Myriam Dunn Cavelty and Thierry Balzacq, London, New York: Routledge, 2017, p. 145.

them to trial and by the intelligence agencies[33]. There are two role of policing that the police needs to implement. The first is high policing that deals with threat to a society as a whole and the micro policing that pose threat to individuals.[34] Especially the high policing is seen as important to counterterrorism and may include for instance the intelligence gathering,[35] however the low policing have also played role since the terrorist attacks are local and police need to deal with them. Police forces have several roles in counterterrorism – it has to gain intelligence, assess risks, investigate, disrupt terrorists´ plans, harden targets, protect importance targets, maintain order, and others.[36] The Police should also establish the link to community and create good relations with them so they could provide police with information about potential terrorist threats.[37]

However police is not the only group dealing with terrorism in the criminal model. Besides police and other groups of people that are naturally part of justice systems – such as judges, lawmakers, lawyers etc., countries also create special groups dealing with counterterrorism. "most countries have specialized agencies entirely separate from the police that engage in counterterrorism abroad – collecting information, penetrating potential terrorist and/or criminal groups, and taking preventive action."[38] The counterterrorism responsibilities at domestic level are carried by "a national agency specializing in counterterrorism….one or more national police services,…all police agencies at any governmental level."[39] Terrorism is judged based on different laws, many of them adopted specially to fight terrorism. Even though terrorism is seen as crime, it is often seen as more serious crime and somehow different from other criminal

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[33] Ibid., p. 146.
[34] David H. Bayley and David Weisburd, „The Role of the Police in Counterterrorism," 2007, p. 6
[35] Ibid., p. 8.
[36] Ibid., p. 16-17.
[37] Ibid., p. 7.
[38] Ibid., pp. 9-10.
[39] Ibid., p. 10.

activities. European countries fight terrorism both on national level with domestic law but also on regional level – as the European Union, which:

"created an EU-wide arrest warrant, agreed on a common definition of 'terrorism' and a common list of terrorist groups, and drafted rules for joint operations between national police forces. Governments gave Europol, the EU police agency, extra resources, and set up a counterterrorism task force consisting of national police officers. The governments also created Eurojust, the EU´s nascent law enforcement agency, to help national magistrates work together on cross-border investigations."[40]

Although it may seem that the counter-terrorism on the European level is working smoothly it still faces difficulties in form of lack of resources and insistence of national states that counter-terrorism is a national issue.[41]

The European Union is not the only organization that is using the criminal model to fight terrorism, the Organization for Security and Co-operation in Europe (OSCE) member states also believe that terrorism should be treated as serious crime. It should be treated based on criminal justice and the human rights should be respected. [42] Another organisation stressing the importance of law are the United Nations. For example the United Nations Office on Drugs and Crime (UNODC) created in 2009 a whole handbook dealing with the Criminal Justice Responses to terrorism.[43] The handbook deals with many aspects of the criminal model and it also stresses the need to respect the rule of law and not violate human rights while fighting against terrorism.[44] It also

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[40] Keohane, *The EU and counter-terrorism*, p. 17.
[41] Ibid., pp. 18-22.
[42] *Preventing Terrorism and Countering Violent Extremism and Radicalization that Lead to Terrorism: A Community-Policing Approach*, OSCE, Vienna:2014, pp. 19,29.
[43] Handbook on Criminal Justice Responses to Terrorism, Uited Nations, 2009.
[44] Ibid., p. 6.

presents the legal international conventions and protocols adopted to fight the terrorism over the years.[45] The list of these documents can be found in appendix of this thesis. Besides that UN Security Council also adopted number of resolutions to fight international terrorism. These include for instance the 1373 resolution adopted in 2001 that required freezing of terrorists´ assets, denial of travel to safe havens or preventing recruitment of new terrorists. The UN as a whole then required international cooperation and other measures (like information sharing or judicial assistance) which all were based on criminal justice measures. [46] The problem of human rights is very important and is thus mentioned several times throughout the handbook. It includes the forbidding of torture, or discrimination that can be never violated.[47]

Very important for the legal cooperation against terrorism is the implementation of international measures into domestic law and criminalization of acts connected to terrorism. These means to determine which acts are seen as criminal offences and to make sure that there are appropriate punishment for them. It includes terrorist financing, offences related to aviation and vessels and, also to dangerous materials.[48] When dealing with terrorists based on the criminal justice model, it requires that the fair trial will be held.[49] Suspects have right for legal assistance and equal treatment among other measures of fair trial.[50]

To sum it up, it is important for criminal model that it treats terrorists as criminal offenders who are arrested by police and face trial that based on law decide on what kind of punishment or how long time in jail will they serve. The investigation is often connected to intelligence sharing.

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[45] Ibid. Pp. 12-14
[46] Ibid. P. 15-16.
[47] Ibid. P. 19.
[48] Ibid., pp. 36-37.
[49] Ibid., p 92.
[50] Ibid., pp. 84-85.

The problem of definition is also closely connected to the criminal model. Academics and politicians cannot agree if terrorists are combatants or criminals. Those who claim that terrorists are criminals, and thus should be dealt with the criminal model, however often claim that terrorism is somehow different and more serious crime that any other crime. Example of this is McMahan who argues that terrorists are not like other, ordinary, criminals, because they are driven by ideology, have very ambitious goals that concern huge number of people and their goal is to terrorize the whole population.[51] This exceptional character of terrorists in the criminal model often leads to the belief of the need extraordinary measures. McMahan believes that even though police should arrest criminals and kill them only when absolutely necessary (as last resort option) this should not apply to terrorists and the police has right to kill them.[52] This, however, takes us away from the criminal model as described above, with the need to respect law and human rights and takes us to some hybrid version of it, allowing extraordinary measures. These often include torture, extrajudicial killings, or measures such as targeted killing or police shooting[53]. Thus the model that should be about law and justice becomes more about force and violence. The investigation is also often carried out by military even in the domestic settings, such as in the case of the Boston bombings in the United States in 2013.[54]

One of the biggest challenge of the criminal model is thus to handle the balance between ensuring security of your citizens and protecting the civil liberties at the same

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[51] Jeff,McMahan, „War, Terrorism, and the „War on Terror,“ pp. 20-21, https://philosophy.rutgers.edu/joomlatools-files/docman-files/War,_terrorism,_and_the_war_on_terror.pdf.
[52] Ibid., p. 22.
[53] Handbook on Criminal Justice Responses to Terrorism, UNODC, pp. 69-70.
[54] Christine Sylvester, „TerrorWars: Boston, Iraq,“ *Critical Studies on Terrorism*, 7:1, 2014, pp. 14-19.

time.[55] It is also „more reactive approach.[56] Another problem is that states dealing with terrorism as a crime often sees it as domestic problem. They have their own definitions, domestic law etc. which further complicate the cooperation among them. The cooperation is sometimes problematic even at the domestic level, among the institutions[57]

1.3.2. The War Model

Another counterterrorism strategy is the war model that is mainly used by the United States. President George W. Bush launched global war on terrorism after September 11. Since then US is in war with terrorism and particularly al-Qaeda. This strategy is carried out by military and allows United States to kill the terrorists. The war model, unlike the criminal model, also do not respect borders and do fight terrorism wherever in the world.[58] The United States thus remain in the state of war and the victory will not be achieved until al-Qaeda is completely destroyed.[59] It is thus "dominated by its security and military character….and neglected the strategic tasks which are highly relevant to the political, social and cultural environment in which terrorism incubates."[60] This model also rests on the believes that terrorism cannot be defeated with non-violent means only.[61] One advantage of the war model is that war "must rely less on exact

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[55] Laurent Mayali and John Yoo, „A Comparative Examination of Counter-Terrorism Law and Policy,“ *Journal of Korean Law*, Vol. 16:93, 2016, p. 125.

[56] Ibid., p. 126.

[57] Ibid., p. 131- 132. .

[58] Bureš, Terrorism and Counterterrorism in *ROUTLEDGE HANDBOOK OF SECURITY STUDIES* , p. 146.

[59] Christopher, McIntosh, "Counterterrorism as War: Identifying the Dangers, Risks, and Opportunity Costs of U.S. Strategy Toward Al Qaeda and Its Affiliates," *Studies in Conflict & Terrorism*, Vol. 38 Issue 1, 2015, pp. 23-38

[60] Bahey el din Hassan, „War on Terrorism' - War against Human Rights,“ International Conference on 'Terrorism and Human Rights', 2002, p. 54.

[61] Mayali and Yoo, „A Comparative Examination of Counter-Terrorism Law and Policy,“, p. 101.

information and more on probabilities, and guesswork. Thus it is possible to respond faster without necessity of verification of all information. [62]

They, unlike European states, fight terrorism far away from their domestic territory and attack their safe havens in Afghanistan and other countries. The war model includes also targeted killing, often done by drones, that aim at killing terrorist leaders and making the organization incapable of carrying out terrorist attacks.[63]

There are some reasons that makes United States more willing to use the war model. First is the capability gap. The US, unlike the European Union has the ability to fight terrorism abroad. As Shapiro said:

"Yet, the United States´ specific terrorism problem and its unmatched military capabilities lead naturally to a much greater tendency to use force, a tendency that is often mistaken for doctrine. Europeans would point out that possession of hammer does not make the world into a nail; from the U.S. perspective, having a hammer allows you to make good use of nails. Perhaps the biggest reflection of this difference in capabilities is Washington´s ability to target terrorist sanctuaries abroad." [64]

Another difference between Europe and the United States that make the U.S. more willing to remain in the state of war with terrorism is the different character of threat. United States face the groups such as al-Qaeda who are more willing to be more destructive while Europe faces groups who want political power and thus needs public support[65]. Also the fact that United States face threat from abroad means that the war

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[62] Ibid., p. 105.

[63] Max Abrahms & Jochen Mierau, "Leadership Matters: The Effects of Targeted Killings on Militant Group Tactics," *Terrorism and Political Violence*, 29:5, 2017, pp. 830-831.

[64] Jeremy Shapiro and Daniel Byman, "Bridging the Transatlantic Counterterrorism Gap," *The Washington Quarterly*, Autumn 2006, pp. 39-40.

[65] Ibid, pp. 35-38.

rhetoric can be used for mobilization, while it is not the case for the European Union who face more domestic threats and the war rhetoric presenting the war at home would be more counterproductive.[66]

As with criminal model the non-existence of definition of terrorism causes problems in war model as well. Those who agree that terrorists are not criminals but combatants cannot agree on whether they should have combatant status or remain unlawful combatant and thus not enjoy any rules of the humanitarian law – such as treatment of war prisoners etc. [67] McMahan argues that terrorists, if seen in the rhetoric of war, are unlawful combatants because they intentionally kill civilians and do not wear uniforms to be distinguish from civilian population, thus they do not deserve combatant status and advantages connected to it.[68]

According to Hoffman we are not even sure who we are fighting in this war. Since Al-Qaeda evolved into more networked group with several franchises and inspired other groups, it is difficult to determine who exactly the enemy is.[69]

Another problem of the war model seems to be the fact that it is not clear what does it mean to win such a war.[70] Cronin argues that every war needs to end and that prolonged wars are not beneficial for states, but United States so far failed to define the end goal in this war and they are unable to distinguish within war and peace. It is more complicated by the fact that terrorism will never end and its eradication is impossible.[71] Cronin also argues that because the war on terrorism is so prolonged there are other

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[66] Ibid., pp. 43-44.

[67] McMahan, „War, Terrorism, and the „War on Terror,“ , p. 14-15.

[68] Ibid., p. 17.

[69] Bruce Hoffman, „A First Draft of the History of America´s Ongoing Wars on Terrorism,“ *Studies in Conflict & Terrorism*, 38:1, 2015, p. 75.

[70] Audrey Kurth Cronin, „The 'War on Terrorism': What Does it Mean to Win?“, *Journal of Strategic Studies*, 37:2, 2014, p. 176.

[71] Ibid., p. 177.

problems evolving – these include means becoming an ends in themselves[72], tactics becoming strategy[73] and "all senses of boundary are lost."[74] Groves also writes that "some American leaders and commanders are confusing effectiveness and success, improperly associating tactical disruption of enemy elements with strategic effect. While the country has won some important tactical victories, it is not clear that they are amounting to a strategic impact, or that the gains will last."[75] Thus Americans are blindly following tactics mistaken for strategy that will not lead to desired goals. One example is the targeted killing. While it may seem as success to be able to decapitate leaders of terrorist groups, it is not lasting victory because they can be easily replaced.[76] He believes that United States "failed to recognize" that the most important thing is to gain the hearts of the population so they will not support terrorists which will lead to terrorist inability to attract new recruits.[77]

There is also concern about the leading role of the United States in the war on terrorism which leads to marginalization of the United Nations, ignorance of international law and also creation to more terrorists.[78] Hassan goes as far as pointing to the similarity of Bin Laden´s terrorism and war on terrorism – "Both discourses are based on one orthodox and extremist philosophy which believes that the end justifies the means, and that the only means, regardless of their legitimacy, are force and violence."[79]

Cronin also mentions that the war against terrorism can bring dangerous precedent for other states. Because there is no agreement on the definition and the term terrorism

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[72] Ibid., p. 180.
[73] Ibid., p. 183.
[74] Ibid., p. 186.
[75] Bryan Groves, „America´s Trajectory in the Long War: Redirecting our Efforts Toward Strategic Effects Versus Simply Tactical Gains," *Studies in Conflict & Terrorism*, 36:1, 2013, p. 26.
[76] Ibid., p. 28.
[77] Ibid., p. 30.
[78] Hassan, „War on Terrorism', p. 53.
[79] Ibid., p. 55.

is often vague, there is a danger that states like China or Russia will label some group as terrorist and will use force against it whenever in the world – as United States do now.[80] Another author talking about the difficulties of ending the state of war is McIntosh. He writes that the end goals were not clearly specified. The United States often talks about elimination of al-Qaeda which is according to him impossible. As long as even few members of al-Qaeda exists they can pose a threat to US, and also al-Qaeda is not only a group but also an idea that inspires other groups and thus it is impossible to eliminate it by force .[81] Another complication for ending the war is the fact that wars ends by meeting an enemy even if for the signing of surrender. Since U.S. are not willing to negotiate with terrorists the war seem to be endless further stressing the resources of the country.[82] McIntosh, as the other, already mentioned authors, stress the threat of continuous tactical victories that will not lead to strategic success. He argues that "the goal of U.S. policy – complete elimination of Al Qaeda – and the means chosen – war- are at odds with each other."[83]

1.3.3. The Disease Model

Less common than the two above-mentioned models is the Disease model when terrorism is seen as disease and medical analogy is used for counterterrorism strategies. There are two types of this model, first is the infection disease model introduced by Stares and Yacoubian and second is the terrorism as a cancer analogy introduced by Bryan C. Price. Because there is not much work on this counterterrorism model and it is

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[80] Cronin, „The 'War on Terrorism': What Does it Mean to Win?", p. 193.
[81] Christopher McIntosh, „Counterterrorism as War: Identifying the Dangers, Risks, and opportunity Costs of U.S. Strategy Toward Al Qaeda and Its Affiliates," *Studies in Conflict & Terrorism*, 38:1, 2015, pp. 26-27.
[82] Ibid., p. 28.
[83] Ibid., p. 30.

not so widely used, I will use only these two works to demonstrate the concept of this model.

Stares and Yacoubian focus only on religious terrorism and they look at it" through the lens of epidemiology,"[84] They see especially Islamic terrorism as qualitatively different and argue that while the "conventional counterterrorism responses" such as arresting leaders and sharing intelligence, may work for traditional terrorism but not for Islamic, for which these methods are important but not enough by themselves.[85] They believe that the most sufficient counterterrorism method is to see it as "global health threat."[86] According to them, United States often use metaphors that are connected to disease – these include describing al-Qaeda as mutating/metastasizing, terrorism as virus, and mosques as incubators. They view Islamist ideology as infection spreading among people. [87] The environment is also important determinant in the spread of the infection – for example if the conflict or repression is present. Even though the disease is infectious, some people are "immunized" and will not become terrorists.[88]

What Stares and Yacoubian see as a common feature of terrorism and disease is mainly the impossibility to totally eradicate either of them.[89] To make it manageable, they propose using the same strategy as in epidemiology - containment of the infection so it will not spread uncontrollably, protection of groups that are most vulnerable to getting infected and remedying of the environment appropriate for emerging of the disease.[90]

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[84] Paul B. Stares and Mona Yacoubian, „Terrorism as a Disease: an Epidemiologycal Model for Countering islamist Extremism," The Ridgway Center, 2007.
[85] Ibid., p. 4.
[86] Ibid., p. 5.
[87] Ibid., pp. 5 – 6.
[88] Ibid., p. 10.
[89] Ibid,. P. 6.
[90] Ibid., pp. 11-12.

Price does not agree with this approach. He argues that while many people are exposed to radical ideology only minority adopt this view.[91] He believes that terrorism is more similar to cancer than infectious disease. It is difficult to predict who will become terrorists as well as it is difficult to predict who will get cancer.[92] The same methods that may work on one type of terrorism may not work on another, the same is in the case of cancer when there is need for different treatment. Also, the prevention is in both cases not completely working.[93]

Price thus argues that it is important to "diagnose" the terrorism as soon as possible and identify the suitable strategy for each particular case. It is important to consider different types of tools that can be used in fight against terrorism and do not focus too much on only one.[94] In the relation to counterterrorism he also stresses the importance of acknowledging that some strategies may have good long-term effects but bad short-term ones instead of promising quick victory. It is still similar to cancer treatment when, in case to be cured, you have to experience bad short-term side-effects of chemotherapy.[95]

Even though some countries use the medical metaphors, such as the already mentioned US, the thesis is not aware of any country that will use the disease model as a main part of its counterterrorism strategy. Because of that fact and because of the limited literature on this model, it is not possible to provide its critique and problems it faces.

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[91] Bryan C. Price, "Terrorism as Cancer: How to Combat an Incurable Disease," *Terrorism and Political Violence*, 2017, pp. 4
[92] Ibid, p. 5.
[93] Ibid., p. 8.
[94] Ibid., pp. 9-11.
[95] Ibid. pp. 11-12.

1.3.4. Critique of counterterrorism models

Many of the problems of using counterterrorism models arise from the already mentioned problems. This thesis believes that it is not appropriate to use of counterterrorism model because they do not in reality exists. First of all, none of them, as demonstrated in previous sections, is sufficient in itself to be effective in counterterrorism, which is often mentioned in literature, especially the one dealing with war model – as demonstrated above. This is the reason why states often use combination of different strategies.[96]

Second reason is the fact that even when they are used they are not used in their pure form. This has two meanings. First, no country uses only one of these models. Even U.S. who focuses on counterterrorism as war has some law related to counterterrorism[97], and European states often associated with criminal model do fight war – they sent troops to Afghanistan to fight war against terrorism.[98] Second meaning is that they often are transformed in something different. Even when terrorists are seen as criminals they are seen as some special kind of criminal that require exceptional measures including killing and when they are seen as combatants they still lack the combatant status so the rules of war do not apply. This was already demonstrated in the subsections on criminal and war models.

Another problem is that some measures are also difficult to distinguish to which model do they belong. One of them is targeted killing that is often connected to medical metaphors but is often also seen as part of war. The metaphors include labelling the

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[96] Bureš, Terrorism and Counterterrorism in *ROUTLEDGE HANDBOOK OF SECURITY STUDIES*, p. 146.

[97] "Counterterrorism Law & Regulations," Homeland Security, accessed April, 9, 2018, https://www.dhs.gov/counterterrorism-laws-regulations

[98] "Afghanistan troop numbers data: how many does each country send to the Nato mission there?", *The Guardian*, September 21, 2009, accessed April 9, 2018. https://www.theguardian.com/news/datablog/2009/sep/21/afghanistan-troop-numbers-nato-data

targets as surgical and the terrorist group as tumour;[99] on the other the targeted killing is

conducted by military means and aims to kill the terrorists thus more related to war

model.

1.4. Deradicalization

Now, the thesis will focus on deradicalization which is very important for

counterterrorism as well. It is not exactly counterterrorism model, but it is related to it.

It is often used as part of counterterrorism policies, which deals not only with terrorists

actions but also ideas and the root causes why they became radicalized in the first place.

As the importance to introduce terrorism before talking about counterterrorism it is

equally important to introduce radicalization before talking about deradicalization

efforts. Radicalization is also term without clear definition. There are also various

explanations how people become radicalized. There is the staircase model, the pyramid

model or the conveyor belt.[100] When talking about radicalization it is also important to

distinguish between the cognitive and behavioural radicalization – while cognitive is

only about adoption of ideas, the behavioural is also trying to achieve them, usually by

violence. Radicalization is also often seen as process, since individuals are becoming

radicalized gradually.[101] An exception is for example Mohammed Hafez who sees

radicalization not as process but as puzzle consisted of four different pieces. These

pieces leading to radicalization are grievances (including alienation, exclusion, or

discrimination), networks (friends or family members who are already connected to

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[99] Thomas Gregory, „Targeted killings: Drones, noncombatant immunity, and the politics of killing,"
Contemporary Security Policy, 38:2, 2017, p. 218.
[100] Peter. R. Neumann, „The trouble with radicalization," *International Affairs*, 89:4, 2013, p. 874.
[101] Ibid., p. 875.

extremist groups), ideology and enabling environment and support structures (such as internet). [102]

The understanding of the term "radical" can also be influence by the lenses we are using to look at it. For example if you examine the Islamic group in Europe arguing against homosexuality it will be seen as radical from integrational point of view, however not from security as long as they will not attacks anyone. The homegrown-terrorists can, contrary, be seen as radical in security terms while they are fully integrated and thus while analysing them from integration point of view they are non-radicals.[103]

Another way the term radical can be also understood is as a contrast to the mainstream/normal and it is different in various contexts, times etc. – for example in some settings supporting the gay marriage would be radical while in others not.[104] What further complicate the understanding of radicalization is that not everyone who is radicalized on cognitive level take the next step and act violently, and not everyone engaged in terrorism is deeply radicalized, but may act for other reasons.[105]

There are disagreements not only on what radicalization means and what causes it but also on deradicalization. There are no agreements on how far needs the deradicalization programs to go – if fight cognitive or behavioural radicalization, or how to assess its effectiveness.[106]

With the relation to the distinction between cognitive and behavioural radicalization there are two approaches to deradicalization – The Anglo-Saxon and European

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[102] Mohammed Hafez, „The radicalization puzzle: a theoretical synthesis of empirical approaches to homegrown extremism," *Studies in Conflict and Terrorism*, 38, 2015, pp. 958-975.
[103] Mark Sedwick, „the Concept of Radicalization as a Source of Confusion," *Terrorism and Political Violence*, 22:4, 2010, pp. 488-490.
[104] . Neumann, „The trouble with radicalization," p. 876.
[105] Ibid., p. 881-882.
[106] John Horgan nad Kurt Braddock, „Rehabilitating the Terrorists?: Challenges in Assessing the Effectiveness of De-radicalization Programs," *Terrorism and Political Violence*, 22, 2010, p. 268.

Approach. While the former focus on the behavioural radicalization and tolerate the cognitive one, the later stress the need to deal with both kind of radicalization. This is mostly for the different historical experience, while U.S. created with the help of ideas once considered as radical, Europe has bad experience with ideologies that led to the Second World War.[107] There are problems with both of them however. While the Anglo-Saxon may tolerate hate speeches because of its views, the Europe may be too eager to fight ideologies that may prevent her to even use some non-violent radicals to her advantage.[108]

Deradicalization goes thus one step further than other strategies. While other counterterrorism strategies try to prevent terrorists from carrying out terrorist attacks, deradicalization tries to disengage them from radical ideas and change their belief system. Deradicalization should be focused on ideology. Gregg suggests that United States should focus more on fighting Islamist ideology and not only on physically eliminating terrorists. In his article Fighting the Jihad of the Pen, he suggests that while US do not have credibility in Muslim world to introduce alternative ideologies, it still have, for instance, provide space for debates about ideologies. He stresses the need for questioning radical Islamist ideologies and shows the lack of unity among terrorist groups and their interpretation of Islam and the world and also to introduce new, competing, ideology. This, however has to be done from within the Muslim world.[109] This should help people who were radicalized or face the threat of radicalization to question the ideology.

Gregg also shows the example of Saudi Arabia, which this thesis will talk about more later in the empirical part, as the country who engage in deradicalization programs

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[107] Neumann, „The trouble with radicalization," pp. 885-888.
[108] Ibid., pp. 888-891.
[109] Heather S. „Fighting the Jihad of the Pen: Countering Revolutionary Islam´s Ideology," *Terrorism and Political Violence* 22, no. 2, 2010, pp. 292-306.

and debate radical ideas with extremists, to make them question these ideas and impose them to new, non-radical, understanding of Islam.[110] These programs have been introduces also by many other states, for example Singapore.[111]

Dechesne argues that for deradicalization to be successful there has to be some "self-initiated openness" because new set of beliefs that is completely externally imposed is unlikely to work. [112] There are push and pull factors that make the membership in terrorist group no longer tempting. The push-factors may be disillusion, loosing belief in the ideology or also criminal prosecution. The pull factors are something that makes the life outside of the group more desirable – such as family or desire for normal life.[113] These are however more connected only to behavioural deradicalization.

Many deradicalization programs are based on dialogue and are placed to prison settings, often with a promise of early release or some other advantages. This make impossible to determine whether the deradicalization is successful r the individual only desires these advantages promised to him or her.[114] Deradicalization programs often also involved rehabilitated individuals who themselves got deradicalized and now helps others to achieve the same goal. Besides the promise of advantages in form of early release etc., there is also further assistance such as psychological help, assistance with education, or with finding a job or house.[115]

The deradicalization programs are established in various countries – this includes Islamic countries such as already mentioned Saudi Arabia, Yemen and Pakistan or also Western countries such as Denmark, UK or Germany – focusing also, but not

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[110] Ibid.

[111] Dr. Alex P. Schmid, *Radicalisation, De-Radicalisation, Counter-Radicalisation: A Conceptual Discussion and Literature Review*, ICCT Research Paper March 2013, p. 41.

[112] Mark Dechesne, „Deradicalization: not soft, but strategic," *Crime Law Soc Change*, 55, 2011, p. 289.

[113] Jason- Leigh Striegher, „The Deradicalization of Terrorists," *Salus Journal*, Issue 1, Number 1, 2013, pp. 23-26.

[114] Dechesne, „Deradicalization: not soft, but strategic," p. 290.

[115] Samira Shackle, „Exit strategies," *New Humanist*, Autumn 2017, p. 18.

exclusively on Islamic terrorism.[116] Committed to deradicalization of terrorists is also Hamas who is itself seen by some as a terrorist organization. It is mostly afraid of the Salafi jihadists that can pose threat to them, so they try to convince them about their view about what Islam really means they use different methods such as use of finances to control mosques or religious re-education of Salafists.[117].

One for of deradicalization, or probably more appropriate would be the term counter-radicalization (preventing it from even occurring at the first place)[118] is the attempt to gain the hearts and minds of people. For example, the attempt of United States in Iraq to get support by distributing aid and financial support to local communities.[119]

Many of the deradicalization programs today focus on ideology and most often misinterpretation of Islam, however Hamed El-Said argues that the current wave of terrorists (inspired mostly by civil war in Syria) is far less ideologically motivated and far less influenced by religious than previous terrorists.[120]

To stress it once again, we should not mistake deradicalization with disengagement from terrorism. While deradicalization means that people will abandon their radical ideas, disengagement only means that they will abandon the terrorism (they stop being violent), however they may still believe in and support the radical ideas in some others, non-violent ways.[121]

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[116] Ibid., p. 18-20
[117] Björn Brenner, „The Deradicalization of Islamists by Islamists: hamas´s Kid Glove Approach to Salafi Jihadists in the Gaza Strip, 2010-2014, Strategic Assessment, Vol. 20, No. 1, April 2017, p. 33.
[118] „A New Approach? Deradicalization Programs and Counterterrorism," International Peace Institute, June 2010, p. 2.
[119] Kimberlyn Leary, „Engaging Extremists: Diplomacy Through Deradicalization," Harvard kennedy School Review, p. 114.
[120] Hamed El-Said, „Deradicalization: Experiences in Europe and the Raba World," (De)Radicalization and Security, Mediterranean Yerbook 2017, p. 97.
[121] John Horgan, "Deradicalization or disengagement? A process in need of clarity and a counterterrorism initiative in need of evaluation," *Revista de Psicología Social*, 24:2, 2009, pp. 293-295.

1.5. The Alternative Model

The previous section demonstrated that the counterterrorism models are not suitable for counterterrorism even in the Western world – for the reasons already mentioned like the no existence of any of these models in pure form, exceptional measure included in all of them etc. So, because these models do not exist in real world (and are not really used by EU, US or other countries) it does not make any sense to apply them on non-Western world either. That is the reason why I first try to create an alternative model which I will later apply on Indonesia and Saudi Arabia to see whether it is suitable for non-Western world also. I will be drawing on the knowledge gained from previous section, thus still Western based approaches, to create the alternative model

So generally, the counterterrorism strategy should not be consisted of only one of the models but should use various counterterrorism tools appropriate for the given context. It is also important to cooperate with other countries since terrorism became international phenomenon.

It is also important to address the root causes[122] and defeat the radical ideologies. As the thesis already demonstrated, deradicalization is important part of counterterrorism and the counterterrorism strategy cannot deal only with the symptoms – like terrorist attacks, but also causes – and create environment that will not cause grievances and make people attracted to terrorist groups. As was explained in the war model, al-Qaeda and other terrorists groups cannot be defeated if we do not aim to fight the ideology because even though we kill all the terrorists the idea may continue to live and attract new fighters. Thus deradicalization is very important.

Alternative model should be effective. It is difficult to determine which counterterrorism methods are effective, because there is not enough research dealing

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[122] Teun van Dongen, „Break it Down: An Alternative Approach to Measuring Effectiveness in Counterterrorism," *Economics of Security Working Paper* 23, NEAT, pp. 2-5. Pp. 14-15.

with effectiveness[123] and when there is the findings of different authors are often contradictory because of the use of different criteria[124]. It is obvious that the success of the methods is determined by the context and one strategy cannot be used in all cases with the same effectiveness[125]. To be effective counterterrorism method should also respect human rights and not create new grievances that could cause radicalization. It should not submit people to inhuman treatment, torture, unfair trials or take their lives. That means it should not use violence[126] and should not be discriminatory[127] against certain group of people.

It is important to say that this is alternative model that seems effective according to us and the knowledge gained from research for this thesis. However, it does not make it an ultimate truth and anyone can disagree and find even more suitable strategy for countering terrorism.

[123] Cynthia Lum, Leslie W. Kennedy and Alison J. Sherley, , The Effectiveness of Counter-Terrorism Strategies, THE CAMPBELL COLLABORATION, 2006, p. 3.

[124] Eric van Um and Daniel Pisoiu, „Dealing with uncertainty: the illusion of knowledge in the study of counterterrorism effectiveness," *Critical Studies on Terrorism,* Vol. 8, No. 2, 2015, pp. 231- 232.

[125]Ibid., p. 232.

[126] Erik W. Goepner, „Learning from Today´s Wars Measuring Effectiveness of America´s War on Terror," *Parameters* 46(1), Spring 2016, p. 111-117.

[127] Didier Boyenval, „Discrimination and counterterrorism," *DEFENCE MANAGEMENT REVIEW*, issue 2, p. 1-2.

Empirical part

2. Indonesia

2.1. Indonesia Country profile

In this section, the thesis will provide some information about Indonesia. It will start by general information about Indonesia, then continue to provide information about terrorist attacks that took place in the country, using data from Global Terrorism Database, and in the last part of this section, it will give information about terrorist groups operating in Indonesia.

2.1.1 General Profile

Indonesia is country situated in South East Asia and it consists of thousands of islands. Indonesia has the biggest Muslim population in the whole world[128] and Islam is also the major religion of the country. Other religions include for example Christianity, Buddhism, Confucianism or Hinduism.[129] There is high ethnical diversity and some parts of Indonesia even demand separation from the country and creating their own state. In the past Indonesia was colony of the Dutch and gained independence in 1949. It is a democratic country now, after the dictator Suharto was toppled in 1998.[130] It has mostly Sunni population[131]. Some Islamic groups are part of government.[132] One of them is for example the United Development which is the largest Islamic party in the

[128] „Indonesia country profile," BBC, 12 June, 2017, accessed March 20, 2018, http://www.bbc.com/news/world-asia-pacific-14921238

[129] "Religions", Indonesia, Encyclopaedia Britannica, accessed April 9, 2018. https://www.britannica.com/place/Indonesia/Religions

[130] „Indonesia country profile," BBC, 12 June, 2017, accessed March 20, 2018, http://www.bbc.com/news/world-asia-pacific-14921238.

[131] Ashraf, „Transnational Cooperation on Anti-Terrorism," p. 92.

[132] William M. Wise, „Indonesia´s War on Terror," The United States- Indonesia Society, August 2005 p. 27.

country. For instance Vice President Hamzah Haz who was part of Megawati´s government (2001-2004) was also head of this party.[133]

2.1.2. Terrorist Attacks

Indonesia has experienced 738 attacks on its soil that killed about 1215 people. The most attacks happened in 2001 that experienced 106 attacks and the deadliest year was 2002 when terrorists groups killed 246 people. For some years however, the numbers are not all known. The first year with terrorist attacks in database is 1977 when one attacks took place.[134] The number of attacks and people killed per year is provided in table 1 in appendix.

Among the most well-known attacks in Indonesia are, for example the Bali bombing from October 2002, or the Jakarta bombing of the J.W. Marriott Hotel in August 2003.[135]

2.1.3. Terrorist Groups

One of the most well-known terrorist groups operating in Indonesia is Jemaah Islamiya. It is Islamist terrorist group with connections to al-Qaeda. This connection was established in Afghanistan where some of the members of JI fought alongside a-Qaeda against Soviet occupation. The roots of Jemaah Islamiyah go as far as 1948 in organization Darul Islam that fought against Dutch colonizers. After independence the group fought for establishemt of Islamic State[136] JI returned to Indonesia after the end

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[133] Senia Febrica, „Securitizing Indonesia in Southeast Asia Accounting for the Varying Responses of Singapore and Indonesia,“ Asian Survey, Vol. 50, No. 3, 2010 pp. 585-586.
[134] "Indonesia," Global Terrorism Database, accessed December 2017, https://www.start.umd.edu/gtd/search/Results.aspx?page=1&search=Indonesia&count=100&expanded=no&charttype=line&chart=overtime&ob=GTDID&od=desc#results-table
[135] Wise, „Indonesia´s War on Terror,“ p. 1.
[136] Robert Eryanto Tumanggor, „Indonesia´s Counter-Terrorism Policy,“ UNISCI Discussion Papers, no. 15, October 2007, p. 89.

of Suharto´s regime. JI has also operational basis in other South-East Asian countries-such as Malaysia where they were waiting for the end of the authoritarian regime of Suharto.[137] Al-Qaeda´s plans to operate in the country was first known to intelligence in Indonesia as early as 1998.[138] Actually the Jemah Islamiya is not officially declared as terrorist group. The president refused to declare the group as terrorist because many citizens have seen it as legitimate movement.[139]

There are many other groups who were at various times operating in Indonesia. There are at least 36 different groups in the database and some attacks were committed by unknown groups or by groups with only general description available – such as Muslim extremists or separatists etc. Indonesia experienced different kind of terrorism – the two major groups are Islamic terrorism and separatist terrorism[140]. The Islamic groups often campaign for the establishment of Islamic State in Indonesia that would be ruled by sharia law regulations.[141] The separatist terrorism was mostly common in 1990s and connected to East Timor and Aceh (this one was continuing even at the beginning of the 21st century) and Islamist terrorism dominates in 21st century. Other types of terrorist groups in Indonesia are Christian extremists, or anti-imperial movements in 1970s and 1980s. Many of these groups have already ended its activity in Indonesia, and they are not that well known today, others continue in their attacks.[142]

One of the groups that have started attacking Indonesia in more recent history is Islamic State, more particularly its local supporters such as Partisans of the Caliphate

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[137] Wise, „Indonesia´s War on Terror," p. 19.
[138] Juhaya S. Praja, „Islam Post 9-11: Indonesia´s Experience." 132nd International Senior Seminar Participants´Papers, Resource Material Series no. 71., p. 40.
[139] Febrica, „Securitizing Indonesia in Southeast Asia," p. 587.
[140] "Indonesia," Global Terrorism Database
[141] Syamsul Arifin, „Islamic religious education and radicalism in Indonesia: strategy od de-radicalization through strengthening the living values education," *Indonesian Journal of Islam and Muslim Societies*, Vol. 6 no. 1, 2016, pp. 94-95.
[142] "Indonesia," Global Terrorism Database

and other groups.[143] So while Indonesia was able to reduce the threat from JI, it now faces another threat from the Islamic State. [144]Some Indonesia´s citizens even went to fighting for Islamic State to Iraq or Syria. And some have already returned. [145]

Some of the other groups operating in Indonesia are:

Jamaah Ansharut Daulah responsible for attacks in 2012, 2015 and 2016.[146] This group was established in 2015 and consist of almost two dozen groups. The group pledged alliance to Islamic State.[147]

Free Papua Movement, group that is active in GTD since 1992, the last attack is in database from 2016[148]. It is a separatist movement with the goal of independence for West Papua. The group is waging guerrilla warfare since 1960s. [149]

Lekagak Tenggamati, group that carried attacks in 2015 and 2016 together with Free Papua movement[150]. There is not much information available on this group.

Mujahidin Indonesia Timur is a group that is active in Indonesia since 2012 and carried terrorist attacks every year since its establishment.[151] The group is associated with Islamic State and many of its members are former members of JI.[152]

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[143] Dirk Tomsa, „The Jakarta Terror Attack and its Implications for Indonesian and Regional Security,“ ISEAS Yusof Ishak Institute, Issue 2016, No. 5, pp. 2-3.
[144] Ibid., pp. 2-3.
[145] Ibid.
[146] "Indonesia," Global Terrorism Database
[147] "Jamaah Ansharut Daulah," Global Security, accessed December,8 2017. www.globalsecurity.org/military/world/para/jad.htm.
[148] "Indonesia," Global Terrorism Database
[149] „Free Papua Movement,“ Global Security, accessed December 8, 2017, https://www.globalsecurity.org/military/world/para/papua.htm.
[150] "Indonesia," Global Terrorism Database
[151] Ibid.

Free Aceh Movement is one of the more active groups, carrying attacks in Indonesia between 1977 and 2005[153]. The goal of this group was the independence of Aceh. It kept fighting the guerrilla war even though being forced underground in 1990s. In 2005 they signed peace treaty with Indonesian government. [154]

Laskar jihad is responsible for attacking Christian communities in conflict areas in Indonesia It allegedly have ties to Suharto, former Indonesian dictator[155], and in the GTD it is mentioned only in two years 2001 and 2002. [156].

Other groups that were active on Indonesia soil, and that we do not have much information about are - Aceh Singkil Islamic Care Youth Students Association that was active in 2015; West Indonesia Mujahideen active in 2015. Jamaah Ansharut Tauhid, created in 2011 in Indonesiaand carrying attacks in 2011 and 2012[157]; Anti-Apostate movement alliance active between 2007 and 2008 and responsible for one attack only, which did not killed any people;[158] Islamic defenders´ Front active in 2005 and 2006, responsible for two attack that killed one person;[159] Mujahidin Ambon, active in 2005, responsible for one nonlethal attack; Mujahedin Kompak responsible for one attack in 2001; Dayak gang also founded in 2001 and responsible only for one attack; Mahidi, active in 1999, responsible for one attack; Besi Merah Putih Militia also active in 1999;

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[152] "Narrative Summaries of reasons for Listing – Qde. 150 Mujahidin Indonesian Timur (MIT)," United Nations Security Council Subsidiary Organs, accessed January 30, 2018, https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list/summaries/entity/mujahidin-indonesian-timur-%28mit%29,

[153] "Indonesia," Global Terrorism Database.

[154] „Free Aceh (Aceh Merdeka)," Global Security, accessed December 8, 2017, Globalsecurity.org/military/world/para/aceh.htm .

[155] " Who are the Laska Jihad?," *BBC*, April 28, 2002, accessed December 8, 2017, http://news.bbc.co.uk/2/hi/asia-pacific/1956007.stm .

[156] "Indonesia," Global Terrorism Database.

[157] Ibid.

[158] "Indonesia," Global Terrorism Database

[159] Ibid.

People´s sovereignty party also active during 1999; Aitarak Militia active in 1999;

Pemuda Pancassila, also active in 1999 and responsible only for one attack in the

database; Ninjas, active in 1990s, carrying two attacks in 1995 and one in 1998;

Revolutionary front for an independent East Timor, active between 1989 and 1997;

National Council of Maubere Resistance formed in 1979 and inactive now,[160] carrying

one attack in 1996; Armed Forces for Liberation of East Timor, active between 1992

and 1995; Huria Kristen Batak Protestan active in 1995; Commandos of France active

only in 1986; Anti-Imperialist International Brigades also active in 1986; Iran Jaya

Rebels responsible for the two attacks in 1978 and 1984; and Komando Jihad active

only in 1981.[161]

2.2. Indonesia Counterterrorism Measures

This subsection will analyse counterterrorism measures adopted by Indonesia.

Indonesia had not paid attention to counterterrorism and did not admit that she has a

problem in that area before Bali bombing in 2002 which was changing situation for

her.[162] This is also because of the fact that Indonesia and United States sees terrorism

differently and thus Indonesia did not see the group on her soil as terrorist problem[163],

which brings us again to the difficulties connected to impossibility to define terrorism

so far, described in theoretical part of this thesis. "The general framework" of

Indonesia´s counterterrorism strategy "has six principles…: supremacy of law,

indiscrimination, independence, democracy, and participation." [164] The indiscrimination

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[160] "National Council of Maubere Resistance", Tracking Terrorism,
https://www.trackingterrorism.org/group/national-council-maubere-resistance
[161] "Indonesia," Global Terrorism Database
[162] Eryanto Tumanggor, „Indonesia´s Counter-Terrorism Policy,p. 94
[163] Ibid., p. 582.
[164] Ibid., p. 94.

means that Indonesian government want to treat all people equally and do not have any prejudice against any group of people.[165]

Indonesia created some institutions for dealing with counterterrorism. For instance the Desk for Coordination of Eradicating Terrorism which is part of Ministry of Political and Security affairs and whose purpose is to formulate policies and coordinate efforts in counterterrorism;[166] and the Detachment 88, special police counterterrorism unit which was created after Bali bombing in 2002,[167] she also created National Counter-Terrorism agency which for example created Blue print for Deradicalization and created Deradicalization Center for terrorist inmates.[168] The agency also took coordination responsibilities for counterterrorism and all the other institutions and units fighting terrorism were placed under her overview – this include the Desk for Coordination of eradicating Terrorism, Detachment 88, intelligence agencies, and anti-terrorism units.[169] Other efforts are within competition of various ministries, intelligence agencies, police and there is also cooperation of some NGOs that will be shown later.

Indonesia has ratified many international legal documents aimed at fighting terrorism. These includes Convention on Offences and Certain Other Acts Committed on Board Aircraft – 1963, Convention for the Suppression of Unlawful Seizure of Aircraft – 1970, Convention for the Suppression of Unlawful Acts against Safety Aviation – 1979, Chemical Weapon Convention – 1993, Biological Weapon

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[165] Ibid., p. 95.

[166] Praja, „Islam Post 9-11: Indonesia´s Experience," p. 41.

[167] Tom Allard and Kanupriya Kapoor, "Fighting back: How Indonesia´s elite police turned the tide on militants," Reuters, December 23, 2016, accessed April 9, 2018, https://www.reuters.com/article/us-indonesia-security/fighting-back-how-indonesias-elite-police-turned-the-tide-on-militants-idUSKBN14C0X3

[168] "Indonesia and Counterterrorism," Ministry of Foreign Affairs Republic of Indonesia, January 20, 2016, accessed April 10, 2018, https://www.kemlu.go.id/en/kebijakan/isu-khusus/Pages/Combating-Terrorism.aspx.

[169] "Indonesia: New Anti-Terrorism Agency Established," Library of Congress, August 9, 2010, accessed April 9, 2018, http://www.loc.gov/law/foreign-news/article/indonesia-new-anti-terrorism-agency-established/.

Convention – 1972, International Convention for the Suppression of the Financing of Terrorism – 1999, the Comprehensive Test Ban Treaty – 1996.[170] She also supports the Resolution 2178 adopted in 2014 that deals with the issue of foreign fighters, it "urges states to conduct all necessary efforts, including the prevention of FTF recruitment and travel facilitation, border control, information sharing , as well as rehabilitation and reintegration program."[171] Indonesia also held many regional workshops dealing with issue of foreign terrorist fighters.[172]

The first domestic counterterrorism law was issued after the first Bali bombing that has taken place in 2002 – anti-terrorism law No 15/2003.[173] Before its adoption terrorism was dealt with by using Criminal Code and Code of Criminal Procedure.[174] The Anti-terrorism law (ATL) adopted in 2002 should "make investigating, prosecuting and convicting terrorists easier."[175] The ATL allows for new types of evidence (such as electronic correspondence, pictures etc.)[176] and longer periods of detention for people suspected of terrorism.[177] Most of the acts seen by ATL as terrorist are already covered by the Criminal Code – these include murder, arson, or property damage.[178] It also deals with Aviation or Chemical and Biological terrorism and financing terrorism.[179] It provides opportunity to sentence the terrorists for life imprisonment or for death penalty.[180] However, it does not seem to enough anymore and some people within the government are already asking for new law which will be

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[170] Eryanto Tumanggor, „Indonesia´s Counter-Terrorism Policy," pp. 94-95.
[171] "Indonesia and Counterterrorism," Ministry of Foreign Affairs.
[172] Ibid.
[173] Eryanto Tumanggor, „Indonesia´s Counter-Terrorism Policy," p. 95.
[174] Dr. Simon Butt, „Anti-Terrorism Law and Criminal Process in Indonesia," ARC Federation Fellowship Islam, Syari´ah and Governance Background Paper Series, The University of Melbourne, 2008, p. 4.
[175] Ibid., p. 4.
[176] Ibid., p. 20.
[177] Ibid., p.4.
[178] Ibid., pp. 12-13.
[179] Ibid., pp- 8-12.
[180] Ibid., p.9.

more suitable. The call came in 2017 after the stabbing of police officer.[181] Indonesia

has also law on Citizenship that punish everyone who leave to fight as foreign fighter

for terrorist organization by losing his citizenship.[182]

Robert Eryanto Tumanggor described Indonesian counterterrorism model as indirect,

which means not dependent on military means but rather focusing on other strategies.
[183] Indonesia is distancing herself from the Global war on terrorism lead by United

States. And Megawati , the Indonesian President, criticized the use of force in

Afghanistan and Iraq. [184] One of the reasons Indonesian government cannot adopt

violent strategies, especially against Islamic terrorists, is that majority of its people,

unlike in United States, are Muslims and these brutal strategies may antagonize them

from government. For example , majority of Indonesians saw US´ actions in

Afghanistan as illegal and there were also anti-U.S. demonstrations in Indonesia in

response to that. [185] Presidents needed also the support of Islamic parties in

government[186] so they need to be careful about brutal responses to terrorist groups.

Even though Indonesia does not participate in war on terrorism, she still has also

military counterterrorism units at her disposal.[187] She is also conducting joint military

counterterrorism training with Singapore to keep her forces ready.[188]

Indonesian government also recognizes the importance of intelligence. One of the

means how Indonesian government acquire intelligence is from people. It requires

participation of citizens on counterterrorism effort and want people to be its "eyes and

[181] "Indonesia: Call to Update Terrorism Law," Library of Congress, July 6, 2017, accessed April 9, 2018, http://www.loc.gov/law/foreign-news/article/indonesia-call-to-update-terrorism-law/

[182] "Treatment of Foreign Fighters in Selected Jurisdictions: Country Surveys," Library of Congress, accessed April 9, 2018, https://www.loc.gov/law/help/foreign-fighters/country-surveys.php#Indonesia.

[183] Eryanto Tumanggor, „Indonesia´s Counter-Terrorism Policy," p. 91.

[184] Febrica, „Securitizing Indonesia in Southeast Asia," p. 581.

[185] Febrica, „Securitizing Indonesia in Southeast Asia," pp. 584-585.

[186] Ibid., pp. 585-587.

[187] "Indonesia,: New Anti-Terrorism Agency Established," Library of Congress.".

[188] Prashanth Parameswaran, "What´s in the New Singapore-Indonesia Counterterrorism Exercise?," The Diplomat, December 8, 2017, accessed April 9, 2018, https://thediplomat.com/2017/12/whats-in-the-new-singapore-indonesia-counterterrorism-exercise/.

ears and to inform the security and legal authorities if they are aware of an act of terror

being planned and prepared."[189] Even though Indonesia do not seem to engage her

military in the strategies dealing with Islamic terrorism she used them against

separatists, who also committed some terrorist attacks against her, in East Timor[190] and

Aceh[191].

Of course, people are not the only source of intelligence that Indonesian government

has. Information are very important for counterterrorism and for discovering terrorists

plans so states need them. Indonesia has various types of intelligence agencies – these

include: Indonesian´s state Intelligence Agency, the Indonesian Police Intelligence and

Security Agency, the Indonesian Armed Forces Strategic Agency and some others.

President Megawati issued the Presidential Act No 5/2002 which makes the Head of

Indonesian´s State Intelligence Agency the authority that will coordinate all the

intelligence related activities of these intelligent agencies. [192] She also shares

intelligence with other countries for example through ASEAN.[193]

Even though Indonesia is "not a strategically important actor in the world financial

system,"[194] she still puts effort into this area of counterterrorism. She is for instance

member of Asia Pacific Group on Money Laundering and she also signed Memorandum

of Understanding with Financial Intelligence Unit to "strengthen anti-money laundering

and terrorist financing regime."[195] Indonesia was initially put on the FATF list of non-

cooperating countries for her weak efforts in countering terrorist financing and dealing

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[189] Eryanto Tumanggor, „Indonesia´s Counter-Terrorism Policy," p. 96.
[190] "East Timor profile – Timeline," *BBC*February 26, 2018, accessed April 9, 2018, ,
http://www.bbc.com/news/world-asia-pacific-14952883
[191] I. Summary and Recommendations in *Human Rights Report,* 2001, accessed April 9, 2018,
https://www.hrw.org/reports/2001/aceh/indaceh0801.htm.
[192] Eryanto Tumanggor, „Indonesia´s Counter-Terrorism Policy," p. 97.
[193] "ASEAN Partners Agree to Boost Intelligence Sharing," ASEAN REGIONAL FORUM, accessed April 9,
2018, http://aseanregionalforum.asean.org/news-21895/13-asean-partners-agree-to-boost-
intelligence-sharing.html.
[194] Ashraf, „Transnational Cooperation on Anti-Terrorism," p. 113.
[195] "Indonesia and Counterterrorism," Ministry of Foreign Affairs.

with the money laundering. She improved these measures, adopted Anti-Money Laundering Law and created financial intelligence unit.[196] For these improvement she was taken of the list.[197]

Indonesia is willing to cooperate with other countries and also share intelligence with them (for example with US, Sweden, UK, Netherlands, Japan, INTERPOL)[198] but she want to keep the decision making without being restrained by institutions or other powers. "The Indonesian government would not be dictated by foreign powers but rather by professional and accurate proof, through due process and mechanism."[199]

Indonesia also cooperate with ASEAN countries – mostly in the legal area. They carry some joint investigations, assist each other in extradition.[200] Another Organizations through which Indonesia cooperate with other states are the United Nations. She cooperates with the United Nations Counter Terrorism Implementation Task Force, the Terrorism prevention Branch of United Nation Office for Drugs and Crime and the UN Counter-Terrorism Executive Directorate. She also implements the pillars of the UN Global Counter-Terrorism Strategy.[201] Besides that Indonesia is active member of Global Counter-Terrorism Forum and was one of the co-chair of Southeast Asia Capacity Building Working Group between 2011 and 2013 and still engage with detention and Reintegration Working Group helping states to deal with extremism.[202]

In cooperation with Australia, Indonesia established the Jakarta Centre for Law Enforcement Cooperation which helps with capacity building of law enforcement

[196] Ashraf, „Transnational Cooperation on Anti-Terrorism," p. 113-115.
[197] "Indonesia and Counterterrorism," Ministry of Foreign Affairs..
[198] Eryanto Tumanggor, „Indonesia´s Counter-Terrorism Policy," p. 97.
[199] Ibid., p. 95.
[200] Eryanto Tumanggor, „Indonesia´s Counter-Terrorism Policy," p. 97.
[201] "Indonesia and Counterterrorism," Ministry of Foreign Affairs..
[202] Ibid..

officers and conducts their training. 70 countries have already participate in the programs either as trainers or trainee.[203]

Indonesia also focuses on the deradicalization efforts. Its deradicalization program is ad-hoc prison based and mostly police-centred.[204] The program started in 2002 after Bali bombing and was initiated by Indonesian National Counterterrorism Agency.[205] Zora A. Sukabdi quotes in her work the definition of Indonesia´s deradicalization published by The National Anti-Terror Agency. This definition is:

"All type of efforts, through cooperation of various entities, whether in social, psychology, education, economic, culture, human resources, or other related fields, into a continuous process, which aims to rehabilitate terrorism inmates so they are able to be back in society as a holistic individual both mentally, emotionally, economically, and socially, so as to achieve self-sufficiency, productive, and useful to the state and society."[206]

Indonesia also uses former terrorists such as Mohammed Nasir Bin Abbas (former Jemaah Islamiyah comander) who leads dialogues with prisoners and try to re-educate them and correct their misunderstood vision of Islam. Besides that he also assist police while capturing and negotiating with terrorists.[207] Another former terrorist used by Indonesia is Ali Imron who took part in Bali bombing in 2002. He wrote a book and recorded cassettes to discourage people from adopting radical views and joining

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[203]Ibid.
[204] Ibid.
[205] Milda Istiqomah, „In the Name of Counter-Terrorism: Human Rights Abuses in Indonesia,“ *Asia Pacific Journal of Advanced Business and Social Studies*, Vol. 1, Issue , 2015, p. 160.
[206] Zora A. Sukabdi, „Terrorism in Indonesia: A Review on Rehabilitation and Deradicalization,“ *Journal of Terrorism Research*, Volume 6, Issue 2, May 2015, p. 40.
[207] John Horgan and Kurt Braddock, „Rehabiliting the Terrorists?: Challenges in Assessing the Effectiveness of De-radicalization Programs,“ *Terrorism and Political Violence*, 22:2, 2010, p. 273.

terrorist groups. [208] Indonesian government also provides cooperating prisoners with some advantages like some financial support and access to education. [209]

Some evidence suggests that not many terrorists go voluntarily through the treatment.[210] It is difficult to evaluate how effective the program actually is. Even though Indonesia claims that only two or three people out of 458 go back to terrorism, Horgan and Braddock argue that there is lack of transparency in these data and also the meaning of the world recidivism is unclear for them.[211] Another problem with evaluating the effectiveness of deradicalization program is the fact, that radical Islamic fighter may often hide their fate and only pretend to be deradicalized.[212] Hilmy argue that there are two additional problems with Indonesia deradicalization program. The first is, that it cannot by successful as long as it is implemented together with brutal police force – mostly connected to special force Densus 88 that is often violent and even kill suspects – that leads to further victimization and radicalization,[213] and the fact that the deradicalization program itself is widely criticized by the Muslim community – not only radical individuals but also moderate Muslims.[214] Some of them argue that the program is "targeted to suppress Muslims and eradicate the principles of Shari´a Law."[215]

Along with official governmental deradicalization program, there are also some non-governmental deradicalization programs in Indonesia. Some of them are for example carried out by women NGO´s in Indonesia – two largest are Fatayat and Aisyiah. They focus on various campaigns, organize seminars, workshops and forum to help with the

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[208] Ibid.
[209] Ibid., p. 274.
[210] Horgan and Braddock, „Rehabiliting the Terrorists?," p. 274.
[211] Ibid.
[212] Masdar Hilmy, „The Politics of retaliation: The Backlash of Radical Islamists to Deradicalization Project in Indonesia," Journal of Islamic Studies, Vol. 51, No. 1, 2013 p. 132.
[213] Ibid. P. 141-142.
[214] Ibid., p. 144.
[215] Istiqomah, „In the Name of Counter-Terrorism," p. 160.

deradicalization efforts.[216] The results of government led efforts to deradicalize prisoners are best illustrated by the research done by Sukabdi who conducted interviews with detained terrorists who went through the process. To demonstrate some of the opinions of the terrorists:

"The government tries to change us, change our spirit of jihad, using deradicalization program, they actually don't understand us and how to improve us." Another said: "The brothers have actually change a lot, we all have change our thought, but not because of the Anti-Terror Agency, but a life process, we looked at the reality." Next of the detainees said that "changing the jihad spirit is difficult, but changing the behaviour by focusing on economic jihad, now, this is important. Still a jihad, but if before it was a physical jihad using arms, now it is an economic jihad, ..." The last one I want to quote is "Changing our heart and love for Allah and jihad is impossible, but changing our behaviour so we stop bombing is possible, in fact we can."[217]

She offers more quotes but they all basically say the same – disengagement is much more likely than deradicalization. The true deradicalization and transformation of belief system is likely to happen only if it comes from some self-imposed questioning of the ideology, not when enforced from outside. Also the detainees point out some of the flaws of deradicalization program. They stress the need for them to be treat well because force and violence only make them hold more on their ideologies and also the need to counsel everyone differently. Every member is different, have different story,

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[216] Lisa R. Wulan, „Enhancing The Role of Women in Indonesia to Counter Terrorism,“ *Asia Pacific Center for Security Studie*s, 2015, pp. 6-7.
[217] . Sukabdi, „Terrorism in Indonesia: A Review on Rehabilitation and Deradicalization,“ p. 43.

different needs and it should be taken into consideration in the deradicalization program.[218]

2.3. Indonesia Alternative Model Application

Now, the thesis will apply the alternative model, created in theoretical part, on the Indonesian case. The first criterion is the use of various strategies. This is in Indonesian case accomplished. Indonesia focuses on various strategies including use of criminal justice, cooperation, intelligence, countering terrorist financing and deradicalization. Only the war model is not much applied but this is for the reason of local context – the distaste of Indonesian public for War on terrorism, and even though this model is not applied, Indonesia still has counter-terrorism military unit which conducts common training for example with Singapore. The absence of military, however was not true in past while dealing with separatist groups, some of them terrorists, in East Timor and Aceh.

Another criterion is cooperation that I have already addressed in the paragraph above. Indonesia cooperates with both regional powers and more distant powers such as US, UK or Japan. She also cooperates through organizations such as ASEAN, INTERPOL or UN.

The next criterion is the use of deradicalization so focus not only on terrorist actions but also ideology and the causes that led to it. Indonesia do have deradicalization program but its results seem to be uncertain. While the participants seem to accept that there is no need for violence – and were thus disengaged, there are no signs of deradicalization.

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[218] Ibid., pp. 44-48.

Another criterion is the absence of inhuman/violent treatment and thus violation of human rights. While Indonesia do not take part in the war against terrorism and does not lead military operations in other countries to fight terrorism there are some mentions of too violent practices of police counterterrorism unit Detachment 88 which is in some cases too brutal in handling terrorist. This can be problematic.

The last criterion is non-discrimination. This thesis did not find any discriminatory practices. It focuses mostly on Islamic terrorism and since Indonesia is mostly Muslim country it is unlikely that there will be discrimination against Muslims. However, it cannot say with absolute certainty that there are no discriminatory practices whatsoever.

The Indonesian model seems thus close to the alternative model. This would, however be too simple. It is important to say that while the Indonesian counterterrorism strategy consist of most, maybe even all criteria from the alternative model, we also have to look at the way they are implemented. For example, the financial measures were missing until 2002 and they may not be so robust even now because Indonesia, as was said, is not financially very strategic and important. Also as was already said, the deradicalization problem is not completely successful. So while Indonesia goes in the right direction in counterterrorism she still has a long way to go.

3. Saudi Arabia

3.1. Saudi Arabia Country Profile

This section will provide some general information on Saudi Arabia before focusing on her counterterrorism strategies. It will start with some general information and then continue to provide information about terrorist attacks conducted on her soil and terrorist groups operating in the kingdom.

3.1.1 General Profile

Saudi Arabia is monarchy in Middle East. Unlike Indonesia it has never experienced colonialism and it is ruled by Saud dynasty for longer than a two centuries. It is the birth place of Islam with two holly places on her soil – Mecca and Medina. It is also Sunni country, mostly with the Wahhabi ideology[219]. Saudi Arabia is very prestigious because of her oil reserves.[220]

3.1.2. Terrorist Attacks

Saudi Arabia experienced 317 attacks on her soil that killed 642 people. The highest number of attacks happened in 2016 and the highest number of deaths was in 2015. The number of attacks is rising since 2010.[221] The number of attacks is in the table number 2 that can be found in appendix of the thesis.

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[219] Ashraf, „Transnational Cooperation on Anti-Terrorism", p. 92.
[220] "Saudi Arabia country profile," *BBC*, November 5, 2017, accessed April 9 2018, http://www.bbc.com/news/world-middle-east-14702705
[221] "Saudi Arabia," Global Terrorism Database, Accessed December 2017, https://www.start.umd.edu/gtd/search/Results.aspx?search=saudi+arabia&sa.x=0&sa.y=0&sa=Search

3.1.3. Terrorist Groups

Terrorist groups operating in Saudi Arabia are almost exclusively Islamist. This include al-Qaeda or Islamic States. There are at least 17 groups and some unknown attacks and general[222] – the same as in the case of Indonesia. The reason why is Saudi Arabia so attractive for jihadists is the fact that it is the holiest place for Islam – it was born here and two holiest places – Mecca and Medina are on Saudi soil, however the Saudi government is cooperating with West and it also allowed some of the Western soldiers at its holly soil. This is something unacceptable for many Islamic terrorist groups.[223] Saudi Arabia experiences Islamist terrorist and also terrorism connected to its participation in Yemen war. The Houthi extremists are behind many of the recent attacks[224]. The groups that have been active in Saudi Arabia are:

Al-Qaeda in the Arabian Peninsula is the affiliation in al-Qaeda that attacked Saudi Arabia for the first time in 2004 even though some sources date its foundation in 2009.[225] It operates not only in Saudi Arabia but also Yemen and committed some attacks also in France and other places worldwide. Its goals, tactics and ideology are the same as of the broader al-Qaeda. [226] Al-Qaeda in Saudi Arabia – carried out attacks in 2003 and 2004[227], there is not much additional information available on this group.

Another group is the Islamic state and its local provinces - Islamic State of Iraq and the Levant; Hijaz Province of the Islamic State founded in Saudi Arabia in 2015 and active

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[222] "Saudi Arabia," Global Terrorism Database

[223] "The Kingdom of Saudi Arabia and Counterterrorism", white paper 2016, p. 45

[224] "Saudi Arabia," Global Terrorism Database.

[225] "Al-Qaeda in the Arabian Peninsula," Counter Extremism Project, accessed December 18, 2017, www.counterextremism.com/threat/al-qaeda-arabian-peninsula-aqap.

[226] Ibid.

[227] "Saudi Arabia," Global Terrorism Database.

for two years;[228] Bahrain Province of the Islamic State also active between 2015 and 2016; Najd Province of the Islamic State also active between 2015 and 2016.[229]

Other groups include: Houthi extremists (Ansar Allah) active between 2009 and 2016. It is a shia movement backed by Iran;[230] Jaish al-Mukhtar, Iraqi shia militia that is responsible for one attack in 2013; Al-Haramayn Brigades founded in 2003 in Saudi Arabia and since 2005 inactive;[231] Saudi Hezbollah and Hezbollah attacked Saudi Arabia in 1996, 1986 and 1985. There are not much information available on Saudi Hezbollah, but Hezbollah is Iranian-sponsored shia islamist group;[232] Generation of Arab Fury committed two attacks in Saudi Arabia – both in 1989. It is Kuwaiti-dominated shia terrorist group;[233] and Union of the Peoples of the Arabian Peninsula formed in 1979 and responsible only for one attack in Saudi Arabia committed in 1979, that killed five people.[234]

3.2. Saudi Arabia Counterterrorism Measures

Saudi Arabia at first was not concerned much with terrorism and adopting counterterrorism methods – the same as with Indonesia, but she also changed opinion after several attacks on her soil. Before she adopted counterterrorism measures and started cooperate with United States on that matter, she was often accused of even

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[228] Ibid.
[229] Ibid.
[230] "Houthis," Counter Extremism Project, accessed December 18, 2017, www.counterextremism.com/threat/houthis
[231] "Saudi Arabia," Global Terrorism Database.
[232] "Hezbollah," Counter Extremism Project, accessed December 18, 2017, www.counterextremism.com/threat/hezbollah
[233] "Generation of Arab Fury", Tracking Terrorism, accessed December 18, 2017, https://www.trackingterrorism.org/group/generation-arab-fury
[234] "Saudi Arabia," Global Terrorism Database.

supporting terrorist groups.[235] There were two important pressures on Saudi Arabia to adopt counterterrorism strategies. The first were 9/11 attacks that were connected to Saudi Arabia by the fact that majority of the terrorists were from the kingdom; the second was the bombings in Riyadh in 2003 and other attacks in 2004 that showed how vulnerable the kingdom is to terrorism on its soil.[236] While in the past, Saudi Arabia suffered only sporadic attacks, the situation has changed since 2003. "Since May 2003, hardy a week goes by without some kind of attack or confrontation. According to Saudi officials speaking at a counter-terrorism conference in February 2005, over the past two years a total of 221 people, including 92 terrorists were killed in terror attacks and clashes."[237] These were the main reasons why Saudi Arabia started to focus more on counterterrorism and created various strategies and institutions – such as the the Mohammed bin Nayef Centre for Counselling and Care - described in this section. She is continuing in her efforts because the threat continue, now mostly posed by Al-Qaeda in the Arabian Peninsula and the Islamic State[238].

Saudi Arabia does use legal tools in her counterterrorism efforts. The government issued Law Concerning Offenses of Terrorism and its Financing in December 2013. Its definition of terrorist crime is:

"any act undertaken by the offender directly or indirectly in pursuance of an individual or collective criminal enterprise intended to disrupt the public order, destabilize the security of society or the stability of the state, expose its national unity to danger, obstruct the implementation of the organic law or some of its provisions, harm the reputation of the state or its standing, endanger any of the state facilities or its natural

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[235] Ashraf, „Transnational Cooperation on Anti-Terrorism," pp. 100-105.
[236] Ashraf, „Transnational Cooperation on Anti-Terrorism," p. 105.
[237] Joshua Telteibaum, „Terrorist Challenges to Saudi Arabian Internal Security," *Middle East Review of International Affairs*, Vol. 9, No. 3, September 2005, p. 1.
[238] Saudi Arabia and Counterterrorism, White Paper, April 2017, p. 5.

resources, force any of its authorities to do or abstain from doing something, or

threaten to carry out actions leading to any of the aforementioned objectives or

encourage their accomplishment."[239]

This definition seems wide, since it includes even harming the reputation of Saudi

Arabia. The repressive character of Saudi Arabia´s counterterrorism law was noticed by

Amnesty International who accused Saudi Arabia of the using new counterterrorism

law, in 2014, against human rights defender.[240] The report argues that Saudi forces

(security forces and courts) are given special powers to deal with threats that are posed

by terrorists.[241]

Saudi Arabia uses the Shariah law, which sees terrorism and even its financing as

very serious offence and the punishment for it includes even death penalty.[242] People

accused for terrorism can be detained for six months and may not have the right to

communicate with his relatives for 90 months, these times may be even prolonged by

Special criminal Court.[243]

Another law is the Royal Order A/44 Against Terrorism of March 2014 which

declares several groups as terrorists (AQAP, Al-Qaeda in Iraq – later IS, Al-Nusra

Front, Hezbollah in the kingdom, Muslim Brotherhood and Houtis), and criminalized

several offences such as funding of terrorism, communicating with terrorist groups,

loyalty to other countries with the goal to undermined the security of Saudi Arabia,

offenses against other countries, getting international help to undermine safety of the

kingdom promoting fighting in foreign conflicts and issuing fatwas that encourage

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[239] „Algeria, Morocco, Saudi Arabia: Response to Terrorism, The Law Library of Congress, September 2015, p. 3.
[240] Ibid., p. 3.
[241] Ibid., p. 4.
[242] Ibid. P. 5.
[243] Ibid., pp. 5-6.

cross-border terrorism.[244] As soon as 2007 Saudi government also criminalized online

propaganda of terrorist groups by issuing Anti-Cyber Crime Law.[245]

Saudi Arabia is using often the arrest of terrorists (instead of simply killing them –

however the question is how fair the trail is and if they get the death penalty later

anyway). The Saudi white paper from 2017 reports that "Saudi security forces have

arrested more than 300 foreign nationals in the last two years for involvement in

terrorist activities with Daesh."[246] Police is often cooperating with local communities,

who provide it with intelligence that has already let to arrest of several important

terrorists.[247] In 2015 Saudi forces arrested 800 people – both Saudis and non-Saudis –

for support of terrorist groups inside the kingdom. These people were often reported by

their relatives or friends.[248] But the arrests are not the phenomenon of the recent years

and already in period between 9/11 and May 2003, 300 suspected terrorists were

arrested and more than 1 000 questioned.[249] She also has to deal with foreign fighters, as

she is the second biggest source of foreign fighters in Syria and Iraq.[250] The foreign

fighters who return back to Saudi Arabia are imprisoned.[251]

Saudi Arabia is also part of the Global war on terrorism. It uses military means and

carry out air-strikes targeting Islamic State,[252] and it is member of the coalition against

Islamic State. The government was also willing to send ground troops to Syria.[253] Not

only was Saudi Arabia member of the U.S. led coalition but it also established its own.

In 2015 Saudi Arabia established all-Muslim military alliance to fight terrorism in

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[244] Saudi Arabia and Counterterrorism, White Paper, April 2017, p. 34.
[245] Ibid., p. 50-51.
[246] Saudi Arabia and Counterterrorism, White Paper, April 2017, p. 10.
[247] Ibid., p. 12.
[248] Brian Michael Jenkins, „ A Saudi-Led Military Alliance to Fight Terrorism," RAND, 2016, p. 7.
[249] Anthony H. Cordesman, „Saudi Arabia and the Challenge of Terrorism: Reacting to the „9/11 Report,"
Center for Strategic and International Security, 2003.
[250] "IS foreign fighters: 5,600 have returned home – report," *BBC*, October 24, 2017, accessed April 8,
2018, http://www.bbc.com/news/world-middle-east-41734069
[251] "Treatment of Foreign Fighters in Selected Jurisdictions," Library of Congress.
[252] "The Kingdom of Saudi Arabia and Counterterrorism", white paper 2016, p. 3.
[253] Ibid., p. 45.

foreign countries – Iraq, Syria, Libya, Egypt and Afghanistan – and protect Muslim countries.[254] The alliance should not only carry out military operations but also share information and conduct joint trainings. According to Saudi White Paper it has now 41 members. [255]

The Saudi effort to fight terrorism and the effectiveness of this all-Muslim Saudi-led coalition was questioned by West, who is afraid of Saudi effort to implement its version of Islam.[256] The scepticism is also created by the fact that seven of the countries from the new-coalition (Bahrain, Jordan, Saudi Arabia, Turkey, United Arab Emirates, Kuwait, Qatar) and their participation "has been less than was hoped for."[257]

Another military efforts are determined by the Saudi membership in Gulf Cooperation Council, that's military part – The Peninsula Shield Force has been created to deter and respond to aggression against the member states and whose role was expanded to combat the Islamic State.[258]

The most important force in Saudi military operations is the Royal Saudi Air Force who has "carried out 341 strikes against Daesh targets in Syria since the beginning of the international campaign against Daesh. These attacks included the destruction of or damage to Daesh fighters, training bases, compounds, headquarters, command and control facilities, a finance centre, supply trucks and armed vehicles."[259]

The intelligence is important for every counterterrorism efforts. Saudi Arabia uses several ways to gain intelligence. First are her intelligence agencies.[260] Second is the Ministry of Islamic Affairs which monitors for example the religious preaching and can

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[254] Ibid., pp. 47-48.
[255] Saudi Arabia and Counterterrorism, White Paper, April 2017, pp. 54-55.
[256] Jenkins, „ A Saudi-Led Military Alliance to Fight Terrorism," p. 1.
[257] Ibid., p. 10.
[258] Saudi Arabia and Counterterrorism, White Paper, April 2017, pp. 55.
[259] Ibid., p. 55.
[260] Saudi Arabia and Counterterrorism, White Paper, April 2017, p. 3.

find terrorist activity in time.[261] The kingdom also monitors school-education and

Internet activity which all gives her valuable information about terrorist activity in the

country.[262] The last source of Intelligence is also cooperation with other countries – for

instance the US,[263] UK.[264]

Saudi Arabia has also adopted many measures dealing with terrorist financing. The

kingdom adopted strategies focused on terrorist financing in 2002. These measures led

to more control over charities that have been often used by terrorist organization to gain

money.[265] The charities for example cannot transfer money abroad, and the mosques are

forbidden to collect cash.[266] It also started to control many transfers from kingdom and

established measures fighting money laundering. Saudi Arabia cooperated with the

US´FBI and IRS on these measures. [267]

In the area of terrorist financing Saudi Arabia also respect its obligations resulting

from her UN membership. In response to Resolution 1373, adopted by the UN, that

required states to take some measures against terrorist financing, Saudi Arabia adopted

already mentioned Law Concerning Offences of Terrorism and its Financing. The

kingdom also adopted Anti-Money Laundering Law in 2012.[268] She also supported

resolutions number 1267 and 1333 that were also aimed at freezing funds of

terrorists.[269]

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[261] Ibid. P. 33.

[262] Ibid. P. 38.

[263] Ben Flanagan, "Saudi intelligence sharing 'has saved American lives,' former Homeland Security adviser Frances Townsend tells Arab News," *Arab News*, March 23, 2018, accessed April 9, 2018, http://www.arabnews.com/node/1271891/world

[264] Richard Norton-Taylor, "UK-Saudi Arabia: the new special relationship," *The Guardian*, October 7, 2015, accessed April 9, 2018, https://www.theguardian.com/news/defence-and-security-blog/2015/oct/07/uk-saudi-arabia-the-new-special-relationship.

[265] Saudi Arabia and Counterterrorism, White Paper, April 2017, p. 25.

[266] Saudi Arabia and Counterterrorism, White Paper, April 2017, pp. 28-29.

[267] F. Gregory Gause III, „Saudi Arabia amd the War on Terrorism," Hoover Press, p. 95.

[268] „Algeria, Morocco, Saudi Arabia: Response to Terrorism, The Law Library of Congress, September 2015, pp 7-8.

[269] Saudi Arabia and Counterterrorism, White Paper, April 2017, pp. 30.

Saudi Arabia adopted legislation on these areas:

"1) the criminalization of drug-money laundering;

2) the criminalization of money laundering beond drugs;

3) 'Know-Your-Customer' provisions;

4) the reporting of large banking transactions;

5) the reporting of suspicious banking transactions;

6) the maintenance of banking records over time;

7) disclosure protection;

8) the official criminalization of terrorist financing;

9) the reporting of suspected terrorist financing

10) cross-border transportation of currency;

11) the establishment of financial intelligence units;

12) an international law enforcement cooperation system for identification;

13) the ability to freeze terrorist activity without delay;..."[270]

Saudi Arabia also created many institutions dealing with terrorist financing. These include the SAMA – Saudi Arabian Monetary Agency – that requires that all financial institutions adopt and comply with the FATF recommendations (Saudi Arabia has not observer status which require that she will adopt all the recommendations, full membership is expected in 2018). There are also money-laundering units in banks and SAMA who oversee the there is no money laundering. Another institution is money intelligence department that looks into suspicious transactions. And established a

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[270] Saudi Arabia and Counterterrorism, White Paper, April 2017, p. 25.

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financial intelligence unit that is member of Toronto-based body consisted of 152

Financial Intelligence Units – the Egmon group.[271] Saudi Arabia is also member of the

Middle East and North Africa Financial Action Task Force, which is sub-organization

of the FATF.[272] It was established in 2004 and her goals are to implement the FATF

recommendation, the UN treaties, cooperate together to fight terrorist financing in the

region.[273] Another organization is the Counter ISIL Finance Group that was established

in 2015. Saudi Arabia is, together with United States and Italy, co-chair of this

organization, which is aimed exclusively at countering financing of the Islamic State.[274]

Saudi Arabia also insists that the government departments and banks visit

international seminars and conferences; and she also hosted many of these herself.[275]

Another established institution is High Commission that has oversight over all charities

and the contributions.[276]

Saudi Arabia is cooperating with other countries in its counterterrorism efforts. It

was already mentioned that she is member of at least two coalitions and one

organization who is conducting military operations against terrorist organizations,

especially the Islamic State; and also carrying out joint training and share intelligence.

Saudi Arabia is closely cooperating with United States who for instance constructed

some of the military bases in the kingdom.[277] These two countries also cooperate in the

Counter-Terrorism Committee "comprised of intelligence and law enforcement

personnel who meet regularly to share information and resources and develop action

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[271] Ibid., pp. 27-29.
[272] Ibid., p. 29.
[273] Celina B. Realuyo, Combating Terrorist Financing in the Gulf: Significant Progress but Risks Remain, The Arab Gulf States Institute in Washington, January 26, 2015.
[274] Ibid., p. 32.
[275] . Cordesman, „Saudi Arabia and the Challenge of Terrorism."
[276] Ibid.
[277] Saudi Arabia and Counterterrorism, White Paper, April 2017, p. 19.

plans to root out terrorist networks."[278] Saudi Arabia also share intelligence with other

countries – for example Great Britain.[279]However, the ties between US and Saudi

Arabia are getting weaker. That is also allegedly one of the reason that Saudi Arabia

created its own military alliance to fight Islamic State, because she does not believe that

United States will not abandon her.[280] On the criminal level, Saudi Arabia is

cooperating with INTERPOL, with whom it is sharing information, and cooperating

with investigations and capturing of terrorists.[281] Saudi Arabia is also cooperating with

the United Nations. This cooperation led to creation of the United Nations Counter

Terrorism Center in 2011.[282]

   Her cooperation efforts are not however limited only to military alliances or law

enforcement. Saudi Arabia was also holding several conferences on various issues

connected to terrorism – for example ideology or financing. This gives state leaders the

opportunity to meet and discuss counterterrorism efforts and cooperation.[283]

   Saudi Arabia has one of the "best funded and longest continuously running

counter-radicalization program."[284] It focuses on deradicalization because Saudi

authorities recognize the impossibility to defeat terrorism only by use of force.[285] The

deradicalization programs are overseen by government of Interior, and involve also

other parts of the government – such as "Ministries of Islamic Affairs, Endowment,

Da´wah, and Guidance; Education; Higher Education; Culture and Information; Labor;

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[278] Cordesman, „Saudi Arabia and the Challenge of Terrorism.

[279] Ibid.

[280] Jenkins, „ A Saudi-Led Military Alliance to Fight Terrorism," p. 1.

[281] Saudi Arabia and Counterterrorism, White Paper, April 2017, pp. 19-21.

[282] Ibid., p. 21.

[283] Saudi Arabia and Counterterrorism, White Paper, April 2017, p. 13.

[284] Andreas Capstack, „Deradicalization Programs in Saudi Arabia: A Case Study", Middle East Institut, Jun 10, 2015, accessed April 9, 2018, http://www.mei.edu/content/deradicalization-programs-saudi-arabia-case-study.

[285] Christopher Boucek, „Saudi Arabia´s „Soft" Counterterrorism Startegy: Prevention, Rehabilitation and Aftercare," Carnegie Papers, Middle East program, Number 97, 2008, p. 4.

and Social Affairs." [286] It has the prison-based program but she also provides support to families of detainees and aftercare program for released participants. The program was launched in 2004, under the "Prevention, Rehabilitation, and Aftercare" strategy of Saudi government. While the Rehabilitation and Aftercare is aimed at detainees in prison, the Prevention focus on counter-radicalization and for example monitor propaganda on internet etc. The deradicalization program in Saudi Arabia focuses mostly on the religious re-education. Terrorists are seen as victims who misunderstood Islam and thus need to by re-educated about the true meaning of the religion. They discuss Islam with clerics on one-by-one meeting, at the initial stage.[287] This meeting should help the cleric to understand the detainee's personal story, his reasons for joining the movement and his understanding of the religion.[288] The deradicalization program is voluntary for all except the detainees from Guantanamo Bay. Detainees who are seen as unable to deradicalize are separated for the rest so the effort is not ruined. [289] The clerics visiting prisons and debating with prisoners are independent on government, which should increase their credibility to both detainees and their families.[290] The religious figures are often able to get the detainees to cooperate with the police because they are more legitimate figures than governmental officials are.[291] Gabriel Hoef describes the process of Saudi rehabilitation program as follows:

"The rehabilitation program is split into two types of classroom-structured courses. There is a short term (lasting up to two weeks) and a long term (up to six weeks) course during which participants are engaged individually and in groups. Most participants

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[286] Ibid., p. 5.

[287] Gabriel Hoef, „'Soft' Approaches to Counter-Terrorism: An Exploration of the Benefits of Deradicalization Programs," IDC Herzliya, Spring 2015, pp. 31-33.

[288] „A New Approach? Deradicalization Programs and Counterterrorism," IPI, p. 7.

[289] Hoef, „'Soft' Approaches to Counter-Terrorism," pp. 31-33.

[290] Boucek, „Saudi Arabia´s „Soft" Counterterrorism Startegy, pp. 6-7.

[291] Ibid., p. 7.

are placed in the long study program during which they cover ten subjects and discuss
topics such as: takfir, walaah (loyalty) and bay´ah (allegiance), terrorism, the legal
rules for jihad, psychological courses on self-esteem, concepts of religious leadership,
the centrality of scholarly jurisprudence, the importance of authority, the need to
recognize legitimate sources of knowledge and topics of treason, sedition, and the
permissibility of violence. Although there is some lecturing involved, the religious
scholars and clerics prefer to engage with the participants in discussionsand debates in
order to more effectively root out false convictions, as well as to track shifts in their
beliefs. Successful completion of the course requires the participants to pass exams in
each subject."[292]

Some of the prisoners even received early release for memorizing Quran.[293] The
successful participants are moved to "half-way house" for aftercare. They go to the
Mohammed bin Nayef Centre for Counselling and Care, running since 2007.[294] The
center runs 8-12 weeks program and still involve guards. However it is more casual
settings, guards are not in uniforms, there are recreational sports, social and religious
activities and the program is aimed at ability to return back to society. There are still
some official class but also unofficial meetings and the detainees has contact with
psychologists, social workers and clerics. They also receive job training. After release
they still receive support from Saudi government – they get the one year stipend,
assistance in education and finding job and also in finding a house or getting married.[295]
The program supports not only detainees but also their families. This support includes
psychological or economic help and they are allowed to visit the detainees often. For

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[292] Ibid., pp. 33-34.
[293] Ibid., p. 7.
[294] Capstack, „Deradicalization Programs in Saudi Arabia."
[295] Hoef, „'Soft' Approaches to Counter-Terrorism", p. 34.

this assistance however, the government require the family to make sure that the detainee will not return to terrorism.[296]

Saudi government also focus on education at school and the Ministry of Education tries to warn students and their families from the dangers of extremism. They also try to disrupt the recruitment at schools by monitoring teachers and their beliefs – if some of them shows some signs of radicalism.[297] It is not only the teachers whose beliefs are monitored but also the imams. The Ministry of Islamic Affairs also monitor mosques if some of them have some radical preachers.[298] Another way to prevent radicalization is also the public information campaign. This campaign started after the 2003 Riyadh bombing and the government distributed billboards warning against threats of terrorism and extremism. The goal is to discourage people from taking this violent path and to encourage them to cooperate with officials and report suspicious individuals.[299] Another part of deradicalization and counter-radicalization efforts aimed at community as a whole is media campaign. Saudi TV broadcast series called "Jiha Experiences, the Deceit," which shows confessions of terrorist, how the terrorist groups work and also scholars correcting terrorist propaganda from the Islamic point of view. Another campaign is for instance the National Solidarity Campaign presenting "true values" of Islam including the importance of tolerance and moderation.[300]

Besides these efforts the kingdom established an internet-based deradicalization project – Sakinah. The Saudi officials recognize that many cases of radicalization take place online and so they started this project in 2003-2004. It was launched by Ministry of Islamic Affairs. The goal is to prevent online radicalization and thus scholars go

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[296] Ibid. Pp. 35-36.
[297] Boucek, „Saudi Arabia´s „Soft" Counterterrorism Startegy, pp. 8-10.
[298] Saudi Arabia and Counterterrorism, White Paper, April 2017, p. 47.
[299] Boucek, „Saudi Arabia´s „Soft" Counterterrorism Startegy, p. 10.
[300] "The Kingdom of Saudi Arabia and Counterterrorism", white paper 2016, p. 30 - 31.

through websites and challenge extremist beliefs they find and engage in discussion with people who are at risk of being radicalized.[301]

The Saudi government claims that the program is successful in 80-90 per cent of cases and only 10-20 per cent return will not deradicalize, which includes those who refuse to participate. However, as with Indonesia, these numbers are hard to verify and we can never be sure that the participant is truly deradicalized and not just pretending to get out. The problem also is that the deradicalized individuals are often only supporters or low-rank terrorists while the leaders often remain radical. [302]

3.3. Saudi Arabia Alternative Model Application

Finally, the thesis will look at the application of the alternative model. The first criterion, use of various strategies is fulfilled. As Indonesia, Saudi Arabia also uses various strategies. She has laws and arrests terrorists, she uses intelligence, counter terrorist financing, cooperate with others, has deradicalization programs and even takes part in war on terrorism.

The second criterion cooperation, as already said, is also implemented. She is cooperating with other countries – especially US who has been close partner in counterterrorism, and also with organizations – such as Gulf Cooperation Council or UN.

When looking at the third criterion – addressing root causes and fighting radical ideas – deradicalization, it is also fullfiled in Saudi Arabia. She has one of the best and most robust deradicalization programs. She tries to find root causes in first debates with terrorist and then offer them both deradicalization programs and aftercare. For those

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[301] „A New Approach? Deradicalization Programs and Counterterrorism," IPI, pp. 8-9.
[302] Hoef, „'Soft' Approaches to Counter-Terrorism, p. 36.

who are at risk of radicalization, Saudi Arabia offers preventive measures. She also has online deradicalization measures.

The fourth criterion – respect for human rights, and non-violent strategies is problematic in the Saudi case. There are some cases of detaining human rights activists at the terrorist accusation and also Saudi Arabia is part of global war on terrorism and even has its own coalition – carrying out strikes in other countries and killing suspected terrorists. As the effectiveness debate states, even at its limited stage, these may be counterproductive.

The last criterion the non-discrimination is similar as in the Indonesia case. The thesis was not able to find any measures that would be discriminatory in themselves but we have no proof that there are no such practices in Saudi Arabia either.

Saudi Arabia seems to not fulfil only one of the above criteria and that is the non-violent one. However, some of the other ones are very good especially the deradicalization. There are several stages and programs to deradicalize terrorists, they are well institutionalized. This includes the mapping of religious preaching and recruitment at school. Also her counter-terrorist financing measures seem to be well and robust, on the other hand she is well known for the accusation of sponsoring terrorists themselves. There still need to be more research of the overall effectiveness of her counterterrorism. But judging by what is officially known she also appears to be on a good way, only need to reassess her strategies using violence and detaining people for advocating human rights. This is a huge problem.

Conclusion

The goal of this thesis was to look into counterterrorism strategies in Indonesia and Saudi Arabia. The reason for that was the fact that counterterrorism in non-Western world is not often well documented so the thesis wanted to contribute to this limited literature. Another goal was to examine the usefulness of the counterterrorism models for the non-Western world.

The research questions were - Which counterterrorism strategies do Indonesia and Saudi Arabia apply? and the second one is – To what extent are the concepts of the Western counterterrorism models suitable for non-Western countries?

We will start with the second question. The theoretical part has already shown that the counterterrorism models are problematic in themselves even when they are used in Western countries. The problems are that non country use only one of these models, They are too narrow and every country is using combination of various counterterrorism strategies. It is ineffective to use only one of them – which is especially true for the war model because terrorism is also idea and that cannot be destroyed by military means only. These models are also often used in a hybrid form. So even when someone is using criminal model, terrorism is often seen not as ordinary crime but as something special that legitimize extraordinary measures such as torture and someone who sees it as war claim that terrorist has no combatant status and thus do not have to be treated humanely when captured. Some strategies are not even clearly fitting into one of these models. For example targeted killing often connected to medical metaphors can be part of disease model as well as war model. It is thus no matter of location but of the structure of these models itself that makes them unlikely to succeed or be used in a real world.

However when we look as the individual strategies such as arrests, law creation, deradicalization, intelligence, countering terrorists financing etc., they seem to be working as well in non-Western world as they are in the Western one. The important thing is to respect the local context and use suitable mix of these strategies. The ones who does not seem to be effective anywhere are strategies using violence, discrimination, ignoring deradicalization and addressing of root causes and those ignoring human rights – since these create more grievances and thus more reasons for radicalization.

Now the thesis will answer the first question asking about counterterrorism strategies in Indonesia and Saudi Arabia. This question has been already answered in the empirical part where the counterterrorism strategies of both countries were described in detail. To summarize it here both of these countries focus on counterterrorism more since the 21st century. While there was some pressure from the United States after 9/11 they both start focusing on fighting terrorism after attacks on their own soils – Indonesia after Bali bombing 2002 and Saudi Arabia after bombing in Riyadh 2003. For both of them the focus on counterterrorism is very important since they have various groups operating on their soil and they both experienced several attacks even in the previous century. While Indonesia experienced also separatist or for example Christian terrorism, Saudi Arabia seem to have problem only with the Islamic groups who do not like the Saudi policies and the Saudi permission for the presence of United States on the holly soil of the kingdom.

Indonesia uses many different counterterrorism strategies. She adopted new counterterrorism law after Bali bombing 2002 and also supported many international documents on that issue. She is arresting terrorists and putting them to prison where they go through deradicalization program. During that program they discuss the

meaning of Islam with Islamic figures who are former members of terrorist group themselves. There are, also some non-governmental deradicalization effort. Indonesia recognizes the importance of intelligence that is collected by its intelligence agencies or also police in cooperation with local communities. The countering of terrorist financing also plays role in Indonesia. Even though she was criticized for not putting enough effort in countering terrorist financing, she adopted laws concerned with money laundering and improved her efforts in this area. Indonesia is cooperating with other countries and organizations – such as US, UK, Japan, ASEAN, UN etc. She shares intelligence with them, discuss the proper measures to fight terrorism or carry joint investigations. The one strategy not used by Indonesia seems to be the war model, however this is only true for the current strategy to counter mostly Islamic terrorism, her strategies against East Timor and Aceh did include violence too.

Saudi Arabia also uses various strategies. She has adopted laws to deal with terrorists, she is using the sharia law that sees terrorism as serious offence. She also arrests terrorists and supports the international law. Saudi Arabia is officially part of the war against terrorism and she even created her own all-Muslim coalition that is carrying air strikes in Iraq and Syria. The kingdom also recognizes the need for intelligence that she gains for instance from her intelligence agencies of Ministry of Islamic affairs that is monitoring education and preaching. Saudi Arabia has one of the most highly-developed deradicalization programs. She focuses on all – prevention, deradicalization and aftercare. She has prison based program but also after care in a centre that looks more like recreational and which purpose is to prepare deradicalized individuals to return to society. The program on countering terrorists financing is also well developed. Saudi Arabia monitors all suspicious transfers of money and also focuses on charities that were often used by terrorists to collect money in the future. On the other hand she is

also often accused of supporting terrorists financially herself. Saudi Arabia is cooperating with other parties – the Gulf cooperation council, UN and also United States all her Muslim neighbours.

This thesis analysed the counterterrorism measures of Indonesia and Saudi Arabia, asked what they are and how the counterterrorism models seems to fit to non-Western countries. It also attempted to create and alternative model that may be free of the limitations of current models. There is however still need for further research of the effectiveness of these strategies, not only in Indonesia and Saudi Arabia but worldwide to see which strategies are working and how should the fight against terrorism continue in the future.

Summary

The thesis focused on counterterrorism strategies in non-Western world and particularly in Indonesia and Saudi Arabia. In the theoretical part in introduced the term terrorism and attempts for its definition, the counterterrorism strategies, models and also important part of counterterrorism efforts which is deradicalization. Besides that the theoretical part also provided critique of these models and attempted to create an alternative one. The empirical part was consisted of two parallel case studies of Indonesia and Saudi Arabia. After introducing the countries and the terrorist threats and attacks they have been facing, the thesis analysed their counterterrorism policies and then applied the alternative model on them. The thesis concluded that the counterterrorism models are not useful, not even for Western world – because they never exist in the form they have been created. The second finding was about the character of counterterrorism in Indonesia and Saudi Arabia. It is consisted of various different strategies – countering counterterrorism financing, legislature, deradicalization etc. While Saudi Arabia has one of the best deradicalization programmes and is important for countering terrorism financing and also plays a role in War on terrorism, Indonesia is more careful about cooperation, it uses military means less and is also not that important as a financial centre. They both focus on deradicalization and uses legislature and police in the fight against terrorism. They are both quite close to the alternative model.

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Master´s Thesis Summary

This summary (thesis proposition), is the last approved version. However, during writing, there have been some important changes and thus this thesis proposition do not fully reflect the thesis itself.

Name: An Analysis of Counter-Terrorism Strategies in Indonesia and Saudi Arabia

Author: Zuzana Buroňová

Advisor: PhDr. Vít Střítecký, M.Phil., Ph.D.

Context: Terrorism is one of contemporary security threats that still needs more research. Even though both academics and policy-makers focus a lot of their time on studying this issue, we still do not even agree on common definition let alone how to effectively fight terrorism. Islamic terrorism is currently probably the most visible form of terrorism to us. Because of this fact, in this work I will focus on two Islamic countries – Indonesia and Saudi Arabia – to find out how these two countries deal with terrorism (mostly Islamic but also with other forms they face – if such other forms exist in these countries). I chose Indonesia and Saudi Arabia because they are both countries located in regions with presence of Islam and they are both countries with Muslim majority themselves. They are also both Sunni Muslim countries and both experienced some terrorist attacks on their soil. I decided to examine their counter-terrorism methods to see what strategies are Muslim majority countries using, how they differ from one another and how effective are they. We can then learn from these methods because counter-terrorism methods in Western world are often seen as discriminatory against minorities (often Muslim) and thus counterproductive. Counter-terrorism strategies in Muslim majority countries need to respect Muslims even when countering Islamic terrorism so it is important to see what different strategies do they use and how effective they are (if they for example discriminate other minorities and thus worsen the situation as well) so we can later decide if we can learn something from them. Counter-terrorism literature and the studying of counter-terrorism in general often focus on the Western world and their counter-terrorism measures. There are many non-western countries with successful counter-terrorism measures, so I decided to focus on two countries outside of

the western world to contribute to the literature that, unlike the majority, deals with terrorism in non-wester world.

Theorization: Theoretical part of this thesis will deal with different counter-terrorism strategies and their success and applicability on non-western countries. It will examine counter-terrorism as law model, war model and disease model. I will also look at countering terrorism by dealing with terrorist financing, using intelligence in the fight against terrorism and cooperation among states in counter-terrorism strategies as well as on deradicalization as part of counter-terrorism measures. I will also examine the aspects of counter-terrorism operations in non-western world and if the success of counter-terrorism operations is influenced by the democratic/undemocratic system character of states.

Research Question: What are counter-terrorism strategies in Indonesia and Saudi Arabia? Are western-based counter-terrorism models useful for non-western countries? What factors determine the effectiveness and success of counter-terrorism measures?

Methodology: This thesis will use parallel case studies. This methodology was chosen because it suits well the character of the two countries that share some similarities but are very different in some respects. It will analyse counter-terrorism methods used in Indonesia and Saudi Arabia and their effectiveness based on these criteria: the groups operating on their soil (their activity, goals, character), amount of attacks (when there were the most attacks, how deadly are they – using primarily global terrorism database), the counter-terrorism strategies they use (law, war, disease model, terrorist financing, deradicalization etc.), cooperation with other states and the effectiveness of their counter-terrorism strategies (based on decrease of attacks and terrorist groups activity). If there will be decrease in attacks I will also try to eliminate other possible reasons for this decrease not related to adopted counter-terrorism measures.

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Source – *The FATF Recommendations*. INTERNATIONAL STANDARDS ON COMBATING MONEY LAUNDERING AND THE FINANCING OF TERRORISM & PROLIFERATION, February 2012, pp.4-5.

2. INTERNATIONAL LAW ON TERRORISM

Universal instruments against terrorism at a glance

1963 Convention on Offences and Certain Other Acts Committed On Board Aircraft

- Applies to acts affecting in-flight safety.

- Authorizes the aircraft commander to impose reasonable measures, including restraint, on any person he or she has reason to believe has committed or is about to commit such an act, where necessary to protect the safety of the aircraft.

- Requires contracting States to take custody of offenders and to return control of the aircraft to the lawful commander.

1970 Convention for the Suppression of Unlawful Seizure of Aircraft

- Makes it an offence for any person on board an aircraft in flight to "unlawfully, by force or threat thereof, or any other form of intimidation, [to] seize or exercise control of that aircraft" or to attempt to do so.

- Requires parties to the Convention to make hijackings punishable by "severe penalties".

- Requires parties that have custody of offenders to either extradite the offender or submit the case for prosecution.

- Requires parties to assist each other in connection with criminal proceedings brought under the Convention.

1971 Convention for the Suppression of Unlawful Acts against the Safety of Civil Aviation

- Makes it an offence for any person unlawfully and intentionally to perform an act of violence against a person on board an aircraft in flight, if that act is likely to endanger the safety of the aircraft; to place an explosive device on an aircraft; to attempt such

acts; or to be an accomplice of a person who performs or attempts to perform such acts.

- Requires parties to the Convention to make offences punishable by "severe penalties".

- Requires parties that have custody of offenders to either extradite the offender or submit the case for prosecution.

1973 Convention on the Prevention and Punishment of Crimes against Internationally Protected Persons, including Diplomatic Agents

- Defines an "internationally protected person" as a Head of State, Minister for Foreign Affairs, representative or official of a State or international organization who is entitled to special protection in a foreign State, and his or her family.

- Requires parties to criminalize and make punishable "by appropriate penalties which take into account their grave nature" the intentional murder, kidnapping or other attack upon the person or liberty of an internationally protected person, a violent attack upon the official premises, the private accommodations or the means of transport of such person; a threat or attempt to commit such an attack; and an act "constituting participation as an accomplice"

1979 International Convention against the Taking of Hostages

- Provides that "any person who seizes or detains and threatens to kill, to injure or to continue to detain another person in order to compel a third party, namely, a State, an international intergovernmental organization, a natural or juridical person, or a group of persons, to do or abstain from doing any act as an explicit or implicit condition for the release of the hostage commits the offence of taking of hostages within the meaning of this Convention".

1980 Convention on the Physical Protection of Nuclear Material

- Criminalizes the unlawful possession, use, transfer or theft of nuclear material and threats to use nuclear material to cause death, serious injury or substantial property damage.

- Amendments to the Convention on the Physical Protection of Nuclear Material add the following:

Make it legally binding for States parties to protect nuclear facilities and material in peaceful domestic use, storage and transport;

Provides for expanded cooperation between and among States regarding rapid measures to locate and recover stolen or smuggled nuclear material, mitigate any radiological consequences or sabotage and prevent and combat related offences.

1988 Protocol for the Suppression of Unlawful Acts of Violence at Airports Serving International Civil Aviation, supplementary to the Convention for the Suppression of Unlawful Acts against the Safety of Civil Aviation

- Extends the provisions of the Convention for the Suppression of Unlawful Acts against the Safety of Civil Aviation to encompass terrorist acts at airports serving international civil aviation.

1988 Convention for the Suppression of Unlawful Acts against the Safety of Maritime Navigation

- Establishes a legal regime applicable to acts against the safety of international maritime navigation that is similar to the regimes established for international aviation.
- Makes it an offence for a person unlawfully and intentionally to seize or exercise control over a ship by force, threat or intimidation; to perform an act of violence against a person on board a ship if that act is likely to endanger the safe navigation of the ship; to place a destructive device or substance aboard a ship; or commit other acts against the safety of ships.
- The Protocol of 2005 to the Convention for the Suppression of Unlawful Acts against the Safety of Maritime Navigation criminalizes the use of a ship to further an act of terrorism; the transport of various materials with the knowledge or intent that they will be used to cause death or serious injury or damage; the transport on board a ship of persons who have committed an act of terrorism.

1988 Protocol for the Suppression of Unlawful Acts against the Safety of Fixed Platforms Located on the Continental Shelf

- Establishes a legal regime applicable to acts against fixed platforms on the continental shelf that is similar to the regimes established against international aviation.
- The Protocol of 2005 to the Protocol for the Suppression of Unlawful Acts against the Safety of Fixed Platforms Located on the Continental Shelf adapted the changes to the Convention for the Suppression of Unlawful Acts against the Safety of Maritime Navigation to the context of fi xed platforms located on the continental shelf.

1991 Convention on the Marking of Plastic Explosives for the Purpose of Detection
- Designed to control and limit the use of unmarked and undetectable plastic explosives (negotiated subsequent to the 1988 bombing of Pan Am fl ight 103).
- Parties are obligated to ensure effective control, in their respective territories, over ''unmarked plastic explosives''.

International Convention for the Suppression of Terrorist Bombings
- Creates a regime of expanded jurisdiction over the unlawful and intentional use of explosives and other lethal devices in, into or against various defi ned public places with intent to kill or cause serious bodily injury, or with intent to cause extensive destruction of the public place.

1999 International Convention for the Suppression of the Financing of Terrorism
- Requires parties to take steps to prevent and counteract the direct and indirect financing of terrorists.
- Commits States to hold those who finance terrorism criminally, civilly or administratively liable for such acts.
- Provides for the identification, freezing and seizure of funds allocated for terrorist activities, as well as for the sharing of the forfeited funds with other States on a case-by-case basis. Bank secrecy is no longer adequate justification for refusing to cooperate.

2005 International Convention for the Suppression of Acts of Nuclear Terrorism
- Covers a broad range of acts and possible targets including nuclear power plants and nuclear reactors.

- Covers threats and attempts to commit such crimes or to participate in them as an accomplice.
- Stipulates that offenders shall be either extradited or prosecuted.
- Encourages States to cooperate in preventing terrorist attacks by sharing information and assisting each other in connection with criminal investigations and extradition proceedings.
- Deals with both crisis situations (assisting States to solve the situation) and post-crisis situations (rendering nuclear material safe through the International Atomic Energy Agency).

Source - Handbook on Criminal Justice Responses to Terrorism, UNODC, pp. 12-14.

3. Indonesia Attacks – table 1

Year	Number of attacks that year	Number of deaths that year	The highest number of death in single attacks that year
2016	19	22	6
2015	29	22	3
2014	35	20	5
2013	32	23	11
2012	39	15	3
2011	21	20	4
2010	4	0	0
2009	19	15	9
2008	13	0	0
2007	2	0	0
2006	11	6	4
2005	15	66	13
2004	17	42	10
2003	18	24	15
2002	43	246	101
2001	106	135	31
2000	101	143	50
1999	60	67	9
1998	3	9	3
1997	28	102	17
1996	65	30	9
1995	24	41	30
1994	5	2	1
1993	0	0	0
1992	4	33	30
1991	7	21	12
1990	3	12	7
1989	2	85	84
1988	0	0	0
1987	0	0	0
1986	4	0	0
1985	2	7	7
1984	3	2	2
1983	0	0	0
1982	0	0	0
1981	1	4	4
1980	0	0	0

1979	0	0	0
1978	2	0	0
1977	1	1	1

Source – based on data from Global Terrorism Database - Indonesia

4. Saudi Arabia – table 2

Year	Number of attacks that year	Number of deaths that year	The highest number of death in single attacks that year
2016	124	161	31
2015	103	213	27
2014	14	20	7
2013	6	1	1
2012	6	4	2
2011	2	3	3
2010	0	0	0
2009	3	5	3
2008	0	0	0
2007	1	3	3
2006	3	4	4
2005	1	1	1
2004	17	64	22
2003	8	55	17
2002	2	1	1
2001	3	2	2
2000	5	1	1
1999	0	0	0
1998	0	0	0
1997	0	0	0
1996	1	19	19
1995	3	14	7
1994	2	0	0
1993	0	0	0
1992	0	0	0
1991	2	0	0
1990	0	0	0
1989	3	1	1

1988	1	0	0
1987	0	0	0
1986	1	62	62
1985	2	1	1
1984	2	0	0
1983	0	0	0
1982	0	0	0
1981	0	0	0
1980	0	0	0
1979	1	5	5
1978	0	0	0
1977	1	2	?

Source – based on data from Global Terrorism Database – Saudi Arabia