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ADDRESSING RETURN OF FOREIGN TERRORIST FIGHTERS: POLICY OPTIONS AND THEIR POSSIBLE SECURITY CHALLENGES

Master´s Thesis

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Abstract

The thesis explores the foreign terrorist fighter (FTF) phenomenon, specifically within the context of the Islamic State of Iraq and Syria. The chapters analyze existing approaches and strategies designed to respond to foreign individuals returning (expressing their desire to return) to their countries of origin or previous residence. The different undertaken approaches are presented, particularly in a light of their security implications. Furthermore, their various challenges, mostly of political, social, development or legislative nature, are comprehensively introduced.

Key Words

foreign fighter, foreign terrorist fighter, Islamic State, security, Syria, Iraq, returning foreign terrorist fighters

Declaration

I hereby declare that this thesis represents my own work under the guidance of Mgr. Lenka Dušková, Ph.D. Used sources cited in various forms have been acknowledged in the text, as well as in the list of references.

………………………….   ……………………….

place and date   *author´s signature*

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Zásady pro vypracování:

The thesis will explore the existing approaches and strategies designed to respond to the foreign terrorist fighters expressing their desire to return to their countries of origin. The different approaches will be comprehensively analysed with special focus on their security implications.

Seznam doporučené literatury:

CENTER FOR SECURITY STUDIES, 2014. *Foreign Fighters: An Overview of Responses in Eleven Countries.* ETH Zurich
GIUSTO, Hedwig, 2015. *Daesh and the Terrorist Threat: From the Middle East to Europe.* Foundation for European Progressive Studies (FEPS); Fondazione Italianieuropei.
GURSKI, Phil, 2017. *Western Foreign Fighters: The Threat to Homeland and International Security*. Lanham: Rowman & Littlefield.
LISTER, Charles, 2015. *Returning Foreign Fighters: Criminalization or Rehabilitation*. Washington, D.C. Brookings Institution.
MALET, David and Rachel HAYES, 2018. *Foreign Fighter Returnees: An Indefinite Threat?* Terrorism and Political Violence 32(8): 1-19.
POKALOVA, Elena, 2020. *Returning Islamist Foreign Fighters, Threats and Challenges to the West*. Palgrave Macmillan.

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List of Abbreviations

AQI	Al-Qaida in Iraq
COFS	combatants on foreign soil
EU	European Union
ECFR	European Council of Foreign Relations
FF	foreign fighters
FTF	foreign terrorist fighters
HDR	Human Development Report
HS	Human Security
GCTF	Global Counterterrorism Forum
ICSR	International Centre for Study of Radicalization
IS	Islamic State
ISIS	Islamic State of Iraq and Syria
NTS	Non-Traditional Studies
ODIHR	Office for Democratic Institutions and Human Rights
OSCE	Organization for Security and Cooperation in Europe
SDF	Syrian Democratic Forces
UN	United Nations
UNCT	United Nations Office of Counter-Terrorism
UNDOC	United Nations Office on Drugs and Crime
UNDP	United Nations Development Program
UNOSAA	United Nations Office of the Special Advisor on Africa
UNSC	United Nations Security Council

Methodology and Limits

Aim of the Thesis and its Methodology

This thesis aims to explore the foreign terrorist fighters (FTF) phenomenon with particular focus on the context of the Islamic State of Iraq and Syria (ISIS). The emphasis shall be put on existing approaches and strategies designed to respond to foreign individuals returning (expressing their desire to return) to their countries of origin. The different approaches will be comprehensively analyzed in light of their security implications.

Since the issue this thesis is structured around appeared in such an extensive scope only approximately a decade ago, plentiful comprehensive studies addressing this phenomenon are yet to be available. This work aims to generally present the challenge regarding (potential) return of foreign terrorist fighters. More specifically, it strives to introduce several measures that have already been adopted and applied by various countries in a response to such challenge[1].

Additionally, although it may appear that the topic of this thesis falls more under the category of Security Studies rather than International Development Studies, the author sees these two aspects significantly interconnected. The concept of security is no longer merely based on the traditional understanding of sovereignty, territory and military power of states. A gradually increasing attention towards human security further enriched the previously emphasized concept of *freedom from fear* (referring to protection of individuals from threats directed at their physical integrity and security) with the aspect of *freedom of want*, and furthermore acknowledged interrelation of both concepts. Freedom from want emphasizes the protection of human beings so that they might be able to satisfy their elemental needs and their social, economic and environmental aspects of life and livelihoods. The enhancement of human welfare, reaching beyond physical security from violence, together with promotion of an improved quality of life is inextricably linked with fundamental principles of human development.

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[1] Most of the available research on (returning) FTF focuses on a particular region or country (for instance see Renard et al. (2018) focusing on Belgium, Germany and the Netherlands; UNDOC (2019) putting emphasis on the South-East Europe or UNODC (2021) addressing the MENA region) Some countries have presented in depth analysis describing exact policies and strategies used to tackle the FTF phenomenon, while regarding other states, the research might be severally less exhaustive or even lacking. The author of this thesis, on the other hand, decided not to focus on a specific country or a region, but to structure her work around the particular adopted measures along with their (not only) security challenges.

Foreign terrorist fighters pose a challenge both to security and development, and insufficiency of security in various forms oftentimes leads to deceleration (hindering) of development. Moreover, in particular FTF remaining in Iraq and Syria represent a considerable development issue. Most countries of their origin (previous residence) refuse to repatriate their citizens. Such approach of unwillingness may consequently lead to a greater instability in the MENA region including continuation of the prolonged armed conflict in Iraq and Syria or ISIS resurgence. Various development issues might follow, such as casualties, further forced displacement of inhabitants, deepening of poverty, limited access to healthcare and education, deteriorating livelihood, destruction of physical capital, continuous decline in Gross National Income per capita, or continued depreciation of the local currency. More detailed aspects of the foreign terrorist fighter phenomenon shall be revealed in their complexity through particular chapters.

The first section will present different approaches to security embedded in the international relations subdiscipline, security studies. Foremost, a traditional (in particular Neorealistic) view of security will be introduced. The traditional view, placing state as an object to be secured, has shaped the security studies for centuries. In our Westphalia state-centered world, the FTF phenomenon has been an issue that, in particular, states had to address. Moreover, numerous policies have been chosen in order to protect states from this threat coming from the "outside". Yet, as following chapters will disclose, the issue of FTF is a much more complex phenomenon that needs to be addressed through various strategies. And whether we discuss foreign terrorist fighters or those affected by their actions, it is the individuals who are involved and whose rights and freedoms should be protected. Simultaneously, as the concept of security has been further evolving, the emphasis has been put on a human being – it was an individual that became the center of focus. As a result, both, in some ways contrasting and in other complementary, approaches to security are seen as relevant and therefore used in this paper.

The second chapter strives to disclose and explain the very term *"foreign (terrorist) fighter"* from various perspectives. Subsequently, a brief history of the foreign fighter phenomenon shall be drawn with an emphasis put on a specific group of Muslim foreign fighters, also known as jihadis. Furthermore, the distinguishing factors of foreign terrorist fighters aligned with the Islamic State shall be presented.

The following third section will begin with an explanation and timeline of returning foreign terrorist fighter phenomenon. The issue has resulted in a significant response both from the international community and particular states involved in the matter. Several measures together with strategies have been adapted, aiming to tackle the issue of (returning) foreign terrorist fighters, and shall be introduced within the chapter.

Lastly, the fourth chapter will approach the issue of currently detained FTF in Syria, including women and children. The international debate over FTF returnees became more urgent following the territorial collapse of IS and following mass surrender or capture of its affiliates. When addressing the challenge, governments have several options at their disposal. Although the particular legal strategies may vary considerably from state to state, some main options may be identified in a response to such an issue.

Through these distinctive sections, this thesis aims to respond to three main questions which shall be answered in particular chapters:

1. *Who are foreign terrorist fighters and what distinguishes IS FTF among other groups?*
2. *What are the existing strategies designed to respond to (returning) foreign terrorist fighters and what challenges might be connected to them?*
3. *What are the possible approaches to foreign IS affiliates who are currently being detained in Syria and are expressing a desire to return to their countries of origin?*

Striving to answer the above-mentioned questions, a wide array of sources have been used in the making. However, this analysis does not involve a formal meta-analysis of the research literature on foreign terrorist fighters. It is also not intended to be an exhaustive review of particular policies. Rather it emerged from the author´s own comprehensive (but inevitably incomplete) research of relevant information to the matter and serves as a representative sample of approaches implemented by countries affected by the (returning) FTF phenomenon.

The author has used a method of literature review, data analysis and compilation of various sources. Information has been drawn from literature and electronic sources written mostly in English. Open-source information, academic literature, reports of various international organizations and reliable research papers have been reviewed together with relevant electronic contributions. Given the fact that the topic this thesis discusses is yet to be researched to a deeper level due to its recency, in addition to available academic sources the author primarily strived focusing on, relevant non-academic contributions had to be included in this paper. Having in mind the importance of reliability and relevance, carefully chosen electronic non-academic sources have been used, specifically throughout the 3rd and 4th chapter, when discussing applied policies, particular examples of adopted measures or very recent developments connected to the FTF phenomenon.

Possible Limits

The issue of returning foreign terrorist fighters, this thesis strives to describe, is constantly evolving, and most probably this paper will not be able to keep up with the speed with which this phenomenon is unfolding. Further research on the topic shall be of a high value, as foreign fighters will no doubt remain on the political agenda for the upcoming years. It is therefore necessary to deepen the knowledge regarding the root causes of this phenomenon and implement soft preventive, rule-of-law-respecting and adequate measures that will bring results in the long term.

Quality of much of the available data is variable and many of the studies draw conclusions that are too sweeping or firm. And although the lack of data on the topic has not been a bigger issue, the problem of specificity loomed large. Available data is still inconclusive in important ways and as pointed out by Flores (2016), even though significant progress has been achieved in clarifying, for instance, who joined the Islamic State and why, *"more systematic, methodologically exacting, and enterprising comparative research is lacking"*. The studies often reveal more about what remains unknown, than what can be confirmed and presented as a fact. Therefore, the data used in this analysis might be potentially incomplete and possibly imprecise.

To mitigate the level of possible inaccuracies, the author tends to avoid precise numbers (if not confirmed by several reliable sources). Rather she presents the range of possible numbers of fighters calculated from proven sources. Usually, data of the Soufan Group are presented, since, as claimed by the source, each country's number of IS FTF have been compiled from official government estimates or derived from United Nations reports and studies by research bodies. (Barrett, 2017) Estimates of dubious reliability are entirely avoided.

Another challenge has been posed by the terminology. The Chapter *2.1. Defining Foreign (Terrorist) Fighters* outlines problematic aspects of the term as well as points out inconsistencies with regards to scholars´ views and definitions of the issue. For consistency, the author decided to use the term ***foreign terrorist fighters (FTF)*** along with its UNSC definition[2] throughout this paper. This term has been specifically established in reaction to individuals leaving their countries of origin (or stay) to become affiliated with the Islamic State in Iraq and Syria. Additionally, the vast majority of policies and strategies adopted by states in response to this phenomenon occurring, refer to FTF – therefore using the very same terminology.

Despite the author being aware of its inaccuracy and controversy, it is not within the scope of this paper to discuss in detail whether this term is fully suitable and appropriate for the phenomenon it strives to describe. The UNSC definition is broad enough as it allows the inclusion of those individuals who travel to actively fight, those who engage in terrorism-related activities, as well as those who travel to assume non-violent supportive roles. It is acknowledged by the author, that not all foreign actors engaging in ISIS activities might have traveled there willingly nor all of them have been involved in the same activities to the same extent. This thesis does not intent to put all Islamic State´s foreign terrorist fighters into the same basket, as the author realize that each case should be approached individually. However, it is not within the scope of this research to explore motivations which have shaped the decision of those who left for Iraq and Syria, nor this thesis intends to follow in depth particular individual cases of returning FTF.

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[2] FTF are defined as individuals "*who travel or attempt to travel to a state other than their states of residence or nationality for the purpose of the perpetration, planning, or preparation of, or participation in, terrorist acts, or the providing or receiving of terrorist training*". (UN, 2014)

Introduction

Foreign terrorist fighters traveling to Iraq and Syria with the intent of joining struggles of the Islamic State, and consequently, their potential return either to countries of their origin or previous residence, has caused perplexity in public opinion and is posing complex challenges for the states around the world. The phenomenon, while not new, has gained more traction since global travel became easier in the 20th century. Especially the past few decades have seen an accelerated development in not only numbers of FF, but more importantly in the very essence of the aspect.

Since the 1980s, a growing number of conflicts have taken place in Muslim lands, attracting waves of Islamist foreign fighters and marking a new chapter of understanding such phenomenon. But it was especially the rise of the Islamic State of Iraq and Syria and its ability to attract unprecedented numbers of foreign fighters that has created new challenges for global security and peace. And although foreign fighters cannot be considered something new in the global arena, the size of the phenomenon along with the increased conceptualization from the perspective of terrorism has occurred in a unique scope.

As it has proved to be no longer “only” a regional struggle, the international community has started seeking ways to respond to the phenomenon in the most effective manner, while striving to comply with the adopted international norms and standards. Furthermore, with the territorial defeat of the Islamic State, the influx of foreign terrorist fighters has been intensely debated, specifically their movement back to their countries of origin or previous residence. And the question on what states should do both individually and collectively with their citizens who have aligned themselves with the IS has become more relevant, yet to a high extent controversial.

Authorities have oftentimes little experience as well as insufficient empirical evidence of best practice to guide their decisions. Moreover, many factors of various nature have the power of influencing governments´ decisions. As it will be revealed throughout the chapters, states have undertaken diverse and sometimes controversial approaches in dealing with those who have returned or those whose expressed desire to be repatriated remains yet to be fulfilled.

1. Contrast between Traditional Approach to Security and Human Security Concept

"It is always dangerous to attempt to summarize a few key aspects of rich and varied traditions in a short space; centuries of political thought are not easily reduced to a few sentences."

K. Shimko (1992)

1.1. Traditional View on Security

Within the subdiscipline of international relations, security studies, discussions about the term "*security"* are often conducted within a conceptual framework that refers to the "*referent object"*, or, in other words, to the *"object to be secured"*. Proponents of traditionalist mindset portray the state as the fundamental referent object that needs to be secured, especially from military threats coming from other states that have the intention and capability to use force to achieve their goals. Survival, self-preservation and thus security of this political unit bounded by territorial borders is predominantly achieved by having a sufficient military capability along with preparation for war whether it comes or not. (Rudolph, 2003) From its origins in Hobbes and Machiavelli, to classical realist thinkers represented predominantly by Hans Morgenthau, neorealism continues to disclose security challenges by focusing solely on national security of particular states.

As stated by main neorealist thinker Kenneth Waltz (1979), *"the state amongst states, conducts its affairs in the shadow of violence. Because some states may use force at any time, all must be prepared to do"*. Walz sees an outbreak of war as the least possible scenario since the main intention is to deter, not to provoke the enemy. Nonetheless, as Snyder (1984) explains, no state can be sure the others´ intentions are peaceful or will remain so. And since none is able to know that the power accumulation of others is solely defensive motivated, each has to assume it may be intended for the purpose of attack. As Snyder further argues, the state´s territorial integrity is considered a fundamental value and any threats to that automatically endangers its national sovereignty. For this reason, states are constantly competing in their aim to acquire the highest possible security which is predominantly demonstrated by the accumulation (and maximalization) of power. Security has therefore been defined by language of state interests and force.

1.1.1. Anarchy and Power as crucial aspects of Neorealism

The world order is described by traditionalists as a system of competing self-interested state actors under anarchy. Anarchy is understood within the context of absence of an international government possessing the legitimate use of force. It is believed that this lack of such universal government forces states to be security seekers. (Baldwin, 1993; Buzan, 1991). Anarchy implies there are no higher authorities, and since states are considered as primary actors in international relations, they hold the highest authority within the world order. The state remains as a full sovereign of its territory and people, while enjoying the ultimate power of being entirely self-determined. (Elman, 2008)

Similarly, Waltz (1979) sees anarchy as an absence of central authority that occurs as the ordering principle of the international system. In anarchy, different units (states) prevail in a self-help system; therefore, no functional differentiation can be distinguished among them. The main relevant characteristics of the international system therefore remain, according to neorealists, anarchy and relative capacity (power). (Powell, 1994)

Neorealists highlight *power* as being a crucial driving force to achieving security and argue that power should be primarily ensured by a strong, well-prepared military. The idea "*the stronger your military the better your security"* leans on responsive actions of states, reacting to pressuring threats. Competitive environment within the insecure anarchical international system can also be explained as the result of understanding security as a relative object, rather than an absolute one. (Elman, 2008)

The domination of state takes a central place when explained by neorealistic approach to security. Security of its citizens (individuals) is directly dependent on the security of state which is a prime referent object. Individual security is seen as subordinate and secondary. (Waltz, 1979) However, such perspective started shifting after the end of Cold War, when other discourses came to the fore and started significantly challenging the traditional view of security.

Traditional approaches to security (in particular represented by neorealism), while offering perhaps a logical insight into reasons why states tend to pursue and enhance military power, are often criticized for their narrowness. Neorealism represents merely a military focused approach and fails to acknowledge security issues of environmental or socioeconomic nature, which can hardly be ignored in today´s world. Its focal point on military power may often lead to a security dilemma or even arms racing. Portraying the state as the fundamental referent object that needs to be secured, neorealism fails to effectively deal with security concerns below the state (such as disease or food insecurity) and concerns above the state (such as energy security or climate change). It fails to identify the wants and needs of individuals and how that has a potential to affect security on a multi-level basis. (Buzan, 1991; Caballero, 2016) Narrowness and lack of effective response to complex security issues in an ever-changing world led to a significant rise of discussions that challenged the traditional approach and brought different perspectives to the table. In the security discourse, these perspectives tend to be referred to as the Non-Traditional Studies (NTS).

1.1.2. Broadening the Security Agenda

Whereas the nature of threats in the traditional outlook of security is calculated solely in military capabilities and the scope of threat is national, the nature of threats under the non-traditional rubric is not military and the scope is transnational and non-state centric. (Caballero, 2016)

The non-traditional approach to security critically analyze premises of neorealism and its state-centric characteristics, claiming that statism has no longer a place at the center of the security agenda. The core argument by NTS proponents is mainly related to their perception of security itself. As explained by Peoples and Williams (2015), security is a derivative concept which can be interpreted in different ways. Whereas neorealism emphasizes the role of state as the main referent object, opposing NTS approach support extension of the security agenda placing individuals as the main object to refer to.

Barry Buzan (1991) was among the first scholars, who in his book *People, States and Fear,* expressed the need to expand the military-focused security strategy so as to include economic and environmental parameters as well. Human security scholars afterwards further broadened this argument and stated that people as individuals are the primary actors facing threats, not only those of military nature such as wars or conflicts, but also significant challenges related to organized crime, poverty, famine or climate change.

It was the 1994 United Nations Development Program (UNDP) that established the concept of Human Security. As the UNDP report underpins, human security sees the relation of military and non-military aspects as highly intertwined. Nonetheless, advocates of the concept promote that states should move away from the narrow merely military perception claiming that one´s state territorial integrity is being able to be protected exclusively by arms.

1.2. Understanding the Human Security Concept

In an age of multiplying and escalating complex threats (both at national and international level), security of individuals from pervasive fears and risks became an area of policy debate and intellectual discourse. Human security is closely intertwined with human rights, as HS itself (at least in its narrow definition) is a human right. As Article 3 of the Universal Declaration of Human Rights affirms, "*everyone has the right to life, liberty and the security of person*". (UN, 1948) The concept offers a critique to the neorealist paradigm and its relevance to address contemporary issues whose context is not defined by narrow military terms. Key foundational difference between the neorealistic view of security and human security is that *"object to be secured"* shifts from state to an individual.

However, as emphasized by Acharya (2003), human security does not intend to completely discredit the importance of state security. It rather tends to complement state security by enhancing human rights and strengthening human development. HS in its view of the meaning of security also adds a concept of *"freedom from want"* to earlier emphasized *"freedom from fear"*, and furthermore acknowledges their interrelation. However, from a perspective of certain authors including Mary Kaldor (2007), the aspects of *freedom from fear* still overpower *freedom from want* in their importance. Kaldor emphasizes the priority of protection of individuals from direct physical threats and harm to their safety and integrity. Although the *object to be secured* is an individual being, states are still the crucial agents ensuring safety of their citizens, meaning, they are seen as main reactionary actors.

1.2.1 Human Security according to Human Development Report

The origin of the HS concept is rooted in discussions about security that predated the end of the Cold War[3]. The end of the bi-polar world paved the path for new alternative security approaches to the traditional paradigms. This situation has been "*portrayed as a major paradigm shift*". (Peterson, 2013) The questioning of state-centric security along with the deepening globalization have led to the emergence of human security. However, the contemporary understanding of human security dates back to 1994, when the ***Human Development Report*** (HDR) was released by UNDP.

The 1994 HDR defined human security as people´s *"safety from chronic threats and protection from sudden hurtful disruptions in the patterns of daily life*", which is to be ensured primarily through early prevention, then later intervention. The essence of the HS concept is embedded in four general underlying principles. Through bringing together *freedom from fear* and *freedom from want*, human security emphasizes that multidimensional threats faced by individuals are ***universal*** to all people regardless of their nationality, socioeconomic status or geographical location. Secondly, the human security concept is characterized as ***people-centric***, as the unit of analysis is the society, resp. individuals. The third pillar of HS lies in its ***multidimensionality***, meaning, the security of human beings is challenged by a range of various threats. Such threats are ***interconnected***. Failing to ensure security in one area may have a destructive effect on other dimensions as well, since distinguished components of HS are, to a high extent, mutually reinforcing. (UNDP, 1994)

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[3] One essential source of human security was the debate concerning the disarmament-development nexus which took place in various United Nations forums in response to the Cold War arms race. (Acharya, 2003)

Multidimensional threats, though interconnected, have been reflected in seven general separate components of human security: *economic security* (assured basic income, sufficient employment possibilities etc.); *environmental security* (access to clean air, sanitary water supply and non-degraded land system etc.); *food security* (physical and economic access to food); *personal security* (security from physical violence or threats); *health security* (relative freedom from infection and disease, accessible healthcare etc.); *community security* (protection of cultural, religious or inner-ethnic identity, recognition, respect, dignity etc.) and *political security* (protection and implementation of basic human rights and freedoms, good governance etc.). (UNDP, 1994)

1.2.2. Challenges to the Human Security Concept

Focusing on criticism of human security, certain aspects have limited the relevance and usefulness of the concept for scholars of international security studies. Some of the authors (Chenoy and Tadjbakhsh, 2007; Jolly and Ray, 2006) argue that the holistic approach of the concept to human security represents its biggest strength, as it has prompted an intersection between security and development. Such a comprehensive approach to HS also further enabled previously neglected issues to achieve greater saliency in the international environment, either through elevation of particular topics to the realm of "*high politics*" or the increased funding. Human security has served as the motivating factor for the direct enforcement of humanitarian legal standards and human rights. For instance, the consolidation of international humanitarian law and the establishment of supranational courts such as the International Criminal Court (ICC) have been symbols of the human security agenda. (Franceshet, 2006; Shinoda, 2004)

However, as pointed out by Paris (2001), the concept of human security tends to be vague and expansive, having no definite boundaries and comprising everything from physical security to mental well-being. This broadness poses a challenge for prioritization of threats, and together with lack of clear definition disables policy makers to reach consensus and take specific actions to tackle the occurring threats. Further, because the concept of human security encompasses both physical security as well as more general notions of economic, social, cultural and mental well-being, it creates a difficulty (confusion) to talk about certain socioeconomic aspects that might have an impact on the level of HS, since the very same aspects may be part of the HS definition itself.

Ayoob (1997) complements the broadness and vagueness of the concept by focusing attention on another particular angle. He sees a problematic aspect in the fact that already existing issues recognized in other various contexts are being duplicated by human security concept, only presented under different labels. The numerous issues of a broad range discussed within the discipline seems to be a cause of lacking consensus on what human security actually is. Furthermore, according to Sabina Alkire (2003), more than thirty various definitions to the concept have been formed, diverging according to the nature, values and priorities of threats. No consensus has been reached by the international community in reference to strategies to be pursued either.

As a result, the human security concept causes certain confusion along with doubt when it comes to the question of its applicability and effectiveness. By skeptics, it is considered as vague and meaningless, offering little practical guidance to policy makers or those who may be interested in applying the concept. As stated by Paris (2001), attempts to sharpen the definition of HS are considered to be a step in the right direction, yet they are possibly to encounter resistance from actors who claim that the concept´s strength lies in its inclusiveness and holism. While ambiguity and definitional expansiveness might be considered as powerful attributes of human security, it also significantly hinders the concept as a precise, useful tool of analysis within the International Security discipline.

1.2.3. State or Individual?

Human security and national security are complementary concepts which need not necessarily contradict each other. Human security seeks protection of individuals, and in challenging traditional approaches draws attention to the fact that greatest threats to security might often come from internal conflicts (a country itself) rather than from an external adversary. The idea of HS successfully united international agencies, NGOs or invited negotiations within a diverse coalition of states. (Ewan, 2007) Yet, the authority of state cannot be ignored in a state-centric Westphalian international system, where states are the main actors who are also supposed to, to a high extent, supervise the security of individuals.

As an answer, Sverre Lodgaard (2000) proposes a reconceptualization of the idea of security as a *"dual concept of state and human security"*. Security involves both aspects. National security concerns protection of *"territorial integrity of the state and freedom to determine one´s own form of government"*. Security of individuals enhances the idea of security, aiming to ensure safety and survival of people. Both aspects are indivisible and need to be approached together.

Thomas and Tow (2002), on another hand, imply rather than assert that the state and individuals are the *referent objects*. The authors´ claim that their aim is *"assessing how the evolution of HS might proceed in ways that coexist with more traditional approaches, rather than advocating the former outlook´s complete revision"*, also implies dual referents. However, they embrace HS approach primarily as a tool for preventing internal issues arising that have the power to undermine the state-centric view of security.

Finally, Anwar (2003) is another scholar stating that both individuals as well as states are important referent objects. She is explicit that "*state security and HS must not be seen as antagonistic. Instead, they should be regarded as a continuum – each reinforcing the other"*. She argues that no real state security can have place if its citizens (people) are not secure. At the same time, Anwar sees the existence of states as crucial for ensuring the protection and security of individuals.

1.3. Linking Security and Returning Foreign Terrorist Fighters

The emerging phenomenon of foreign (terrorist) fighters affects numerous aspects of today´s globalized world. Foreign combatants intensify the conflicts to which they travel to engage; and can destabilize the country to which they travel next. (Donelly et. al., 2017) Moreover, their recent persistence in militant activities beyond their initial mobilization along with their potential for continuing violence results in significant security concerns. Such concerns over the threat posed by foreign fighters usually persist well beyond time in their theater of conflict.

Referring specifically to the Islamic State of Iraq and Syria, it was the numbers and multinational composition of those drawn to the conflict that were unique and raised a consequential international response. Because of the phenomenon's complexities, the exponentially mounting numbers of foreign combatants and the growing risk that either returnees or copycats at home will create havoc in other countries, governments around the world have started frantically looking for effective responses to counter this phenomenon. (Malet, 2015)

The most pressing solicitude related to the return of foreign terrorist fighters to their home countries is the nature of intentions they bring back with them. Governments are therefore preoccupied with the potential threats that returnees from Iraq and Syria might pose. As Pokalova (2020) points out, perhaps the most insistent concern for many states is the threat of terrorism associated with returnees and relocating foreign combatants. The past experiences have already proven, how effective terrorist agents, perpetrators or recruiters, returning foreign terrorist fighters might be.

And operational connectivity between the Islamic State and perpetrators has been identified for a significant number of terrorist plots within Europe. As underlined by Olidort (2016), between 2014 and 2016, 42 terrorist attacks occurred against the West, of which 38 involved connections on various levels between Islamic State and individuals who carried out the attacks. Another study by Cragin (2018) highlighted the increased participation of FTF who returned or relocated in terrorist attacks, and the effect of their involvement on lethality of these attacks. Focusing on 510 IS attacks carried out outside of Iraq and Syria up to October 2017, Craig finds out that FTF took part in more than 25 % attacks including 87 attacks conducted by foreign terrorist fighters outside of their country of origin. Attacks with FTF involvement were among the most lethal, leading to an average death toll of 35 casualties per attack.

Returning FTF also use their status and credibility to radicalize and recruit other individuals, including from prisons. (CTED, 2018) Enhanced medialization of the Islamic State´s activities presents a significant aspect relevant to security as well. Extensive use of foreigners in propaganda videos, often portraying them torturing, shooting or beheading prisoners, sowed a rapidly growing seed of fear among the international community. (Donelly et. al., 2017; Holland, 2014)

The scope of the FTF phenomenon has pressured (and still pressures) governments to respond. Numerous preventative strategies have been undertaken, as well as FTF returnees have been dealt with in various ways. And as following chapters will disclose, countries focus on finding an effective approach that would satisfy both human security aspects as well as the need for preserving national security and sovereignty of states.

2. Foreign Terrorist Fighters Phenomenon in the Context of ISIS

2.1 Defining Foreign (Terrorist) Fighters

Foreign fighters have been a staple feature of many armed conflicts of various nature over the course of history. There have been numerous examples of volunteers ranging from relatively large and organized groups to individual cases, who have decided to actively engage in international or national armed conflicts. However, defining the term itself in a straightforward and exhaustive way remains quite challenging.

According to various estimations, there have been more than 100,000 foreign fighters engaging in warfare of miscellaneous nature over the past 250 years (See, 2018). This figure however needs to be taken with a grain of salt, whereas, as the following paragraphs indicate, common understanding of terminology related to the discussed topic is rather lacking.

Even though the phenomenon of foreign fighters goes deep into history, first discussions on foreign engagement in diverse rebel groups can be found in scholarly works on civil wars and transnational politics not earlier than since the mid-1960s. However, as David Malet (2015) points out in his research, four decades later, there were still no attempts to study this type of activity systematically in its complexity reaching beyond one selected conflict, or even to provide a more profound analysis on the topic itself[4]. Hegghammer (2010) reaches a similar conclusion as he highlights that existing literature provides rather fragmented answers to the question of the rise of foreign fighters given the fact that this type of activism remains understudied. Descriptions of foreign combatant involvement in individual conflict can be found in various scholar works, but very few authors provide cross-case analyses or theoretically informed attempts at explaining the phenomenon.

Malet (2015) sees a possible explanation in a lack of common terminology between and among policy makers, academics, and journalists. The phenomenon of actors traveling abroad to fight with armed groups unaffiliated to their own country has been described by various terms, including *foreign volunteer*, *transnational insurgent*, *Mujahidin/Jihadist* (for Muslim actors) or already discussed term *foreign fighter (FF).* However, for generating a deeper meaningful discussion on foreign fighters´

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[4] The first extant work to analyze foreign fighters´ activity from a broader perspective was Reuven Paz´s 2005 paper *Arab Volunteers Killed in Iraq*: *An analysis*, which noted a similarity between actors who had fought in Iraq and those who had engaged in comparable activities in Afghanistan or Bosnia. (Malet, 2015; Paz 2005)

mobilization and activity, shared understanding of terms (in particular discerning who exactly a foreign fighter is) remains an essential requirement. Conceptualization and justification of which data are supposed to be included are necessary initial steps of each research, as otherwise, it is nearly impossible for various scholars to analyze the same propositions without confusion.

Several definitions of the term foreign fighter have been proposed by authors focusing on such phenomenon. David Malet (2013) in his comparative study[5] defines foreign fighters as "*non-citizens of conflict states who join insurgencies during civil conflict*". The definition itself has been criticized for its vagueness and broadness, however in his further explanation Malet excludes regular military forces, private contractors operating abroad on behalf of a state, foreign legions, and terrorists.

Barak Mendelsohn (2011) maintains that foreign fighters are not terrorists and employs the standard of "*having citizenship external to the conflict forces, and not being part of a national military, with the distance of the home country from the conflict zone irrelevant to the distinction of legal citizenship".*

Thomas Hegghammer (2010) appears to be more specific in his approach and classifies foreign fighters by four proposed criteria. According to this Norwegian scholar, a foreign fighter is an agent who (1) *has joined and operates within the confines of an insurgency*, (2) *lacks citizenship of the conflict state or kinship links to its warring factions*, (3) *lacks affiliation to an official military organization and* (4) *is unpaid*. The first criterium distinguishes FF from international terrorists who specialize in out-of-area violence against noncombatants. The last criterion excludes mercenaries who are paid and follow the highest bidder, however on the other hand, it could be confusing in the light of data available for instance regarding ISIS fighters who have been proven to earn between $400 and $1,200 a month, plus a $50 stipend for their wives and $25 for each child. (Humud et. al., 2015) Therefore, because of a significant number of instances where financial and ideological or political interests significantly overlap, such individuals may fall within the scope of the definition of FF.

2.1.1. Are Foreign Fighters Truly Foreign? Aspect of Transnational Identity

Despite attempting to precisely define the term *foreign fighter*, above mentioned scholars in their definitions fail to address why people in disparate parts of the world would devote significant amounts of time and energy (for little or no pay) to collaboration with factions with whom they share neither history nor culture; and engaging in armed struggles of no apparent significance to them.

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[5] Malet´s study focused on transnational mobilization by rebels in the Texas Revolution, Spanish Civil War, Israeli War of Independence and Afghanistan war. (Malet, 2013)

Florini (2000) explains that such individuals are bound together more by shared values than shared interest, yet it applies only because they in question conceive of themselves as part of some factions beyond state borders. The state itself, as a legal sovereign entity, is a rather recent concept originating in Western Europe after the Peace of Westphalia in 1648. After that it has been exported by colonialism, then enhanced by international norms, and it has been in place for no longer than a human lifetime in regions of Middle East and North Africa that have experienced large concentrations of foreign fighters, especially in recent decades.[6] (Malet, 2013) Some observers contend that even some Islamic social institutions in the MENA region do not distinguish secular from religious authority, thus devaluating the relevance of state boundaries. Abdullah Azzam (regarded as Osama bin Laden´s mentor) had in fact called for Muslims to give up their "*narrow nationalism*" based on "*borders drawn by nonbelievers*" and instead fight for the global Islamic community. (Rubin and Rubin, 2002)

Schmid (2015) therefore challenges a significantly western-oriented understanding of the word "*foreign*" in the term FF. Volunteers can only be labeled as "*foreign*" fighters if the reference framework adopted as the starting point is that particular one of western-understood concept of state and citizenship – a concept that might be of no significant importance for the very same actors such terminology deals with. When we speak about foreign fighters, we refer to those who hold their citizenship of countries external to the conflict. However, as Connor (1994) argues, citizenship is only a political and juridical construct, but other identities hold stronger sway because they are more immediately present and salient to members.

Against this backdrop, the definition of an Azerbaijani intelligence analyst Jahangir Arasli (2015) appears to be more profound. He focuses on particularly Islamist FF and defines them as "*volunteer combatant actors with no apparent link to the area of the ongoing conflict yet bound to it by their sense of the perceived Muslim religious duty*", highlighting apparent affiliation of the combatants despite their various citizenship.

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[6] For instance, one of the estimates suggests that more than one third of fighters joining ISIS was foreign born. Sam Mullins (2014) assumes that about 70 percent of those fighters come from the Middle East and North Africa region and another 20 percent is an offspring of immigrants to Europe originating mostly from the very same region. What they all have in common is an analogous sense of identity and belonging (not depending on demarcated borders of a given territory) or the same understanding of an urge to fulfill their religious duty.

Similarly, religion is also a significant part of focus in a definition of Geneva Academy of International Law and Human Rights (2014) which has been broadened to include other motivations such as ideology or kindship. It defines foreign fighter as an "*individual who leaves his or her country of origin or habitual residence to join a non-state armed group in an armed conflict abroad and who is primarily motivated by ideology, religion and/or kindship*".

2.1.2. Subsuming Terrorist Nature of Foreign Fighter Activities

Given the fact, that nowadays foreign fighters are, to a large extent, joining groups classified as terrorist organizations, some scholars[7] reflect that by broadening their definitions of foreign fighter phenomenon. David Byman´s (2019) interpretation can serve as such example, as he uses the term foreign fighters in reference to "*individuals who travel to a state other than their own to join an illicit group and perpetrate or assist in terrorist attacks or armed conflict.* Irina Pokalova (2020), in turn, uses the term to designate "*individuals who leave their state of origin or residence and travel elsewhere to take part in an armed conflict or terrorist activity"*.

Developments in Syria and Iraq, in particular, have turned FF into a global phenomenon, threatening national and international security. In both countries, citizens from all different continents have joined various groups and fractions on all sides of the conflict. Moreover, what started as a local political, sectarian and ethnic conflict, has morphed into one having security implications for many countries across the globe. The establishment of Islamic State of Iraq and Syria (ISIS) has mobilized tens of thousands of individuals from over 80[8] countries. This was an unprecedented stream in recent times. Previously, foreign fighters have been a minority in civil wars, however in the case of ISIS, they constituted around 40 % of all engaged individuals. (Malet, 2015; Pokalova 2020; Schmid, 2015)

In 2014, in response to then-escalating crisis in Iraq and Syria, the Security Council (UNSC) adopted a resolution 2170, condemning the terrorist acts undertaken in those territories, in which for the first time the term "*foreign terrorist fighter (FTF)*" was used as UNSC called upon Member States to "*suppress the flow of foreign terrorist fighters*". One month later, on September 24, 2014, the resolution 2178 was adopted to specifically tackle "*the acute and growing threat*" posed by FTF who are defined as individuals "*who travel or attempt to travel to a state other than their states of*

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[7] For instance, see Byman (2019); Pokalova (2020) or UN (2014)

[8] According to some authors (Malet, 2015; Pokalova 2020; Schmid, 2015) it is believed that individuals from more than 120 countries have become involved with the Islamic State. However, not all countries have collected or are willing to disclose their data.

residence or nationality for the purpose of the perpetration, planning, or preparation of, or participation in, terrorist acts, or the providing or receiving of terrorist training". (Pokalova 2020; UN, 2014)

FTF is a comprehensive and established term mainly linked to foreigners leaving for Syria and Iraq with the aim of joining ISIS struggles, and for consistency, this term (though contentious), will be used for this paper along with its definition provided by the UNSC.[9] The definition is broad enough as it allows the inclusion of those individuals who travel to actively fight, those who engage in terrorism-related activities, as well as those who travel to assume non-violent supportive roles. It is acknowledged that not all foreign actors engaging in ISIS activities might have traveled there willingly nor all of them have been involved in the same activities to the same extent.

2.2 Globalism of Jihad: Rise of Muslim Foreign Fighters

The previous section has shown apparent disagreements existing between scholars with regards to defining the phenomenon of foreign fighters. Although transnational insurgencies have occurred for centuries, they have not been perceived as a singular phenomenon by political science scholars. What points to such a conclusion is the fact that no consensus has been reached on the term that would aim to describe the concept. Accordingly, a jointly accepted definition is lacking as well. On the same note, Flores (2016) points out how particularly challenging it is to describe foreign fighters throughout history prior to the "*foreign fighter*" term being in use.[10] Therefore, it must be clarified that the concept remains affected by biases and ambiguities that influence any analysis.

The FF term appears for the first time in reference to Islamist fighters opposing the Soviet invasion to Afghanistan in 80s (Malet, 2013) and since then its definitions have continuously evolved considering historical events over the past decades, mostly on account of lacking the term´s clear meaning within the international legal framework.

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[9] Another reason for using specifically the term "*Foreign Terrorist Fighters*" is the fact that the vast majority of policies and strategies adopted by states refer to returning foreign terrorist fighters (therefore using the very same terminology). Despite the author being aware of its inaccuracy and controversy, it is not in the scope of this thesis to discuss in detail whether this term is appropriate and fully suitable for the phenomenon it aims to describe.

[10] Mostly used expression to describe such phenomenon in the past was "*volunteer*" – a term which applied to various individuals and groups, given the fact that its vagueness provided enough space for all sorts of concepts including, among others, mercenaries who are no longer a part of foreign fighter definitions provided by scholars (Flores, 2016).

2.2.1. A Brief Insight into FF History

It appears to be more challenging to recognize combatants as "*foreign*" before the state-based order was established, as notions about FF are substantially shaped by our state-centric perspective. However, even prior to the birth of the Westphalian State system, notable examples of insurgencies comprising warriors from different transnational backgrounds can still be found. It was mostly mercenary camps holding no particular allegiance to the authorities in their place of origin and motivated mostly by financial gains that have had a ubiquitous presence on the battleground. (Mendelsohn, 2011) Examples can be drawn from the Viking era or later on in reference to the Crusade period which saw the rise of two rival transnational groups later known as *Knights Templar* and *Knights of Malta.* (Malet, 2013)

A new tendency toward the increased presence of foreign volunteers appeared with the birth of the Westphalian State system in 1648 which granted each nation State sovereignty over its territory as well as over domestic affairs. This momentous transformation resulted in a significant decline in demand for mercenary soldiers in conflicts because of the presence of both nationalist ideologies as well as establishment of the organized national armies enabling the States to seek support in the name of common values. (Baker and Singleton, 2016)

However, Janice Thomson (1994) draws attention to the fact that even after the Peace of Westphalia, many years had to pass until the armies were more or less solely composed of the members of the national or ethnic community. Especially in the 19th century a rather broad range of all kinds of volunteers operated, although the distinction between FF and certain kinds of mercenaries was often challenging. Additionally, as Thomson states, not until the 19th century the dominant European powers exerted strong pressure to establish a monopoly over the legitimate use of violence by obstructing the activities of violent non-State transnational actors (for instance pirates). Such a monopoly, nonetheless, often remains rather a theoretical construct, as the State´s actual hold in extensive areas of the globe is fragmentary (insufficient). And despite the development of national laws and international norms stating recruitment by non-State armed groups as an unacceptable activity, transnational insurgencies have become even more prevalent.

With States having professional organized armies to rely on, foreign fighters have more often been found in asymmetric conflicts in which at least one side of the armed struggle represented a non-State actor, usually a guerilla force or some alternative irregular outside group. (Mendelsohn, 2011) Securing independence was one of the instances where foreign fighters came in handy. The United

States, like other nations in the western hemisphere formed in that era, had heavily relied upon foreign troops to ensure its sovereignty. Not only regular foreign troops and individuals had joined the struggle, but also professional officers from Europe had been involved in training the Continental Army. Further, 750 volunteer freemen from Haiti, soon to orchestrate their own anticolonial revolution, opposed the British at Savanah in 1779. (Flores, 2016)

In Greece, foreign fighters enjoyed an immense fame during the successful War of Independence from the Ottoman Empire in the 1820s, and later on their significant presence had been seen during revolutions in Spain, Portugal or Italy. On the other hand, a group of Catholic youngsters who followed the plea of Pope Pius IX to join him in his struggle against the Italian Unificationists in the 1860s can serve as an example of engagement resulting from religious beliefs. (Baker and Singleton, 2016; Malet, 2013)

However, it was the Spanish civil war that attracted, at that time, an unprecedented number of foreign fighters, amounting to roughly 30,000 – 60,000 men. It was in the 1930s, when mostly Western Europeans descended in less than three years upon Spain, fighting on both sides of the conflict. Although, the representation of those supporting Communist International Brigades overwhelmingly surpassed the Nationalist opposition counting only around 1500 foreigners. Communist foreign fighters entered a number of civil wars in the years following the Russian Revolution. In addition to the previously mentioned Spanish civil war, comparable numbers also participated, for instance, in the Chinese civil war. (Renard et. al., 2018)

Since the Cold War, two major streams of foreign fighters can be observed. On one hand, private armed groups have been a continuous political feature in many African regional conflicts. UNOSAA (2007) found that utmost recruits initially joined armed groups under coercion, but by the time they later on became foreign fighters by crossing international borders, they had become willing participants motivated for continuous rebel activity primarily by political grievance. The largest of such FF cohorts operated through the Rwandan Tutsi diaspora with Tutsi refugees fighting mostly in Uganda and later on their second-generation striving to reclaim their unfamiliar homeland. Following the Rwandan genocide, over 10,000 Rwandans have appeared as foreign fighters in Congo and in other parts of the Great Lakes´ region as armed groups became "*rebels without borders*" aiming to obtain security or resources in areas struggling with weak governance. (Malet, 2015; UNOSAA, 2007)

The second major stream of foreign fighters is represented by Islamist fighters, known also as *Jihadis*. This particular group opens a new chapter of understanding the phenomenon as it starts drawing wider attention to the topic of foreign fighters. It was the prevalence of Islamist combatants on foreign soil (COFS) in Sierra Leone that led the United Nations to begin to focus on FF mobilization and repatriation in 2005, a development concurrent with the emergence of studies on Jihadis in Iraq. Most FF in Sub-Saharan Africa are regional actors whose insurgencies conduct their activities transnationally. The UN does note that Islamists are a relatively new phenomenon emerging in Africa, but they appear considerably more effective in attracting FF on average compared to other rebel groups. (UNOSAA, 2007)

Although all the numerous instances of foreign involvement in various conflicts throughout history may have a different course or involve diverse actors from various backgrounds, there is one connecting element, namely a common objective which unified groups of likeminded people willing to travel across state borders for a cause they strongly believed in. For instance, some have joined their efforts to achieve independence while others fought to defend freedom. Malet (2013) calls the connecting element a ***transnational identity,*** which attracts individuals to a certain community along with perceived need to support fellow members of such a community under threat. The ideological background of this identity varied and ranged from left-wing activism and communism to fascism or ethno-nationalism. The latest transnational identity is that of ***Ummah*** (the community of Muslim believers) and the ideology or belief in the so-called violent Jihad. (Baker and Singleton, 2016; Pokalova, 2020)

2.2.2. Opposing Soviet invasion of Afghanistan

The “anti-Soviet Jihad” which emerged in the 1980s is considered to be the first modern conflict to see high levels of foreign combat participation. It is also the first instance where the official term “*foreign fighter*” was used. From that conflict, a global militant community established the funding and strategic networks, credibility and valuable battlefield expertise operationalized in Bosnia and Chechnya a decade later and further on. Consequentially, the term was employed in a connection to the terrorist-led insurgency that broke out in Iraq in 2003. (Donelly et. al., 2017; UNDOC, 2019)

It was primarily the Afghan jihad against the Soviet invasion that, in many ways, became a foundational experience for Islamist foreign (terrorist) fighters. Afghan Arabs laid down the ideological principles of jihadist structures, developed advancing recruitment mechanisms, and cemented together far-reaching jihadist networks. (Pokalova, 2020)

When Soviet troops invaded Afghanistan in 1979 to defend their proxy government in Kabul, the immediate reaction began. Calls to defend fellow Muslim brothers came especially from Pakistan. And although first (mostly Arab) foreigners arriving to Afghanistan viewed themselves as humanitarian workers aiming to help Afghan refugees residing mainly in Peshawar, foreigners arriving during the latter half of the conflict were fighters led by Abdullah Azzam – a charismatic influential Palestinian sheikh calling all the Muslims to their duty to defend Ummah. Azzam´s extensive paramilitary experience and networks from other Muslim countries gave him the operational and ideological clout to effectively navigate FF against the Soviets. And joining forces with one particular volunteer, young Osama bin Laden, opened even more extensive opportunities of funding or network. (Hegghammer, 2010)

Estimates on how many individuals travelled to Afghanistan to engage in the conflict range from 10,000 to 35,000. And when the conflict eventually came to an end in 1989, therefore removing the *raison d'être* for many of the foreign fighters, later known as "*Afghan Alumni*", many went back to their countries of origin. Some re-socialized and resumed a normal life while others joined local militant activities. During that time, a large number of those who decided to remain in Afghanistan aligned with the newly formed terrorist organization Al-Qaida, where they were provided with enhanced military training, aiming to follow Abdullah Azzam´s vision to "*continue the Jihad no matter how long the way is until the last breath and the last beating of the pulse or we see the Islamic state established"*. (Donelly et. al., 2017; Malet, 2013) As highlighted by Hegghammer (2010), there is a fine line between Muslim fighter mobilization and expanding transnational terrorist groups. Looking back at conflicts emerging in Muslim word, one pattern seems to have a tendency of emerging repeatedly. Volunteering for armed struggles is the principal stepping-stone for individual involvement in more extreme forms of militancy.

2.2.3. Transforming local struggles in Bosnia and Chechnya

The collapse of the Soviet Union and following disintegration of Yugoslavia provided fertile ground for FF engagement. Only a month after the war in Bosnia emerged (1992), first Afghan fighters began to slowly transfer to help Muslim Bosnians with the struggle. An estimated 5,000 Afghan veterans and their associates participated in the Bosnian war. (Kohlmann, 2004) The initial movement was hidden under the guise of humanitarian assistance, however very quickly foreign fighters started flooding Bosnia mostly from Peshawar. Violent activities had been funded largely by Afghan Muslim charities;

and centers for religious education as well as military training camps had been established, at the same time attracting new recruits. (Hegghammer, 2010)

Kohlmann (2004) describes the crucial formative effect of the Bosnian war on Al-Qaida as it presented the opportunity to disperse operatives into Western Europe and recruit “unsophisticated Westerners”. Insurgents also played a far more active role in the conflict than they had in Afghanistan. They gained significant paramilitary experience as well as a reputation for brutal treatment of mostly Christian civilians. (Renard et. al., 2018) Moreover, military maneuvers of young fighters, who appeared to have absorbed the messaging of Bosnia as a threat to the Ummah[11], had often been documented and distributed on internet attracting many more to defend a Muslim country being under a threat. (Georges, 2005; Hegghammer, 2010)

As the armed struggles in the Balkans ended, an ethno-religious struggle between Chechnya and Russia escalated. A local conflict aiming to reach an autonomy was also co-opted by an interconnected and well-financed growing group of foreign mobile violent extremists who with themselves brought an extensive battlefield experience from Afghanistan and Bosnia. Chechnya somehow became a shelter for thousands Muslim fighters (*mujahedin)* from various parts of the world and the influx of FF shifted the national struggle into a supranational Jihad. (Flores, 2016)

Nearly all operations in Chechnya had been filmed and distributed, pioneering a well-structured effective and critical form of Jihadi propaganda. Emulating Azzam´s recruiting role from Afghanistan, all media had been directed to a website called “*Jihad in Chechnya*” published by *Azzam Publications*. Enhanced information technology enabled wider recruiting and gave a birth to “***Jihad through the media***” (Donelly et. al., 2017)

2.2.4. The milestone of 9/11 and following consequences

The attacks of 9/11/2001, planned and coordinated by Al-Qaida from within Taliban territory, proved the group´s ability to operationalize their rhetoric in pursuit of the “*far enemy*” and therefore gave the organization tremendous credibility in the eyes of violent extremist communities. Previously mentioned conflicts engaging Islamic FF had been rather considered to be defensive wars on behalf of local Ummahs. But using the attacks, Al-Qaida changed the course of its strategy. It was able to portray the subsequent Global War on Terror as a war against Islam, and obligatory call on Muslims from all over the world to undertake their religious duty to rise up against common enemy – the West, and especially, the USA. (Hafez, 2007)

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[11] “*We realized we were a nation [Ummah] that had a distinguished place among nations. Otherwise, what would make me leave Saudi Arabia – and I am of Yemeni origin – to go and fight in Bosnia? The issues of [secular] nationalism were put out of our minds, and we acquired a wider view than that, namely the issue of the Ummah. Although the issue was very simple at the start, yet it was a motive and an incentive for jihad*.” (Abdullah al-Bahri, a bin Laden´s bodyguard in Georges, 2005)

As a result of the 9/11 attacks, Afghanistan was once again occupied by a foreign power and began yet another phase of a civil conflict. As many as 10,000-20,000 already present foreign fighters were joined by others, coming mainly from the MENA region, China or the former Soviet Union, to fight on behalf of Al-Qaida and Taliban. (Donelly et. al., 2017) Foreign fighters also differed from locals in their ideological diligence (zeal) and their reluctance to accept ceasefires due to the possibility of being deported back to their countries of origin. Despite coming from various backgrounds and having considerable dissimilarities, they were a group of ideologically motivated combatants characterized by fierce determination to the unifying cause. Furthermore, foreign fighters brought to the table an extensive prior combat experience, networks with other Jihadis or access to various funds. All these aspects, together with a successful media propaganda broadcasting around the world, pulled a local far-off conflict onto the very global stage. (Gall, 2014)

Similarly, the subsequent invasion to Iraq in 2003 was once again seized on by Al-Qaida to portray Islam along with Muslim community as being under attack. Numbers of experienced combatants responded to Al-Qaida´s calls and joined the struggle, reaching peak levels around 2007. Successful recruitment mechanisms[12] also resulted in many "*new generation fighters",* usually in their early 20s, joining the conflict. Based on a variety of available estimates, foreign fighters in general constituted between 5 and 10 % of total insurgent forces. At the peak of the resistance, Iraqi insurgents counted between 20,000 and 30,000 fighters. (Hegghammer, 2010; Terrill, 2008)

As highlighted by Pokalova (2020), foreign insurgents had a significant impact on the strategic course of development of events in the conflict as they were often spotted on the front lines setting strategies of combat. Majority of FF came to Iraq well prepared and ready for warfare, but most importantly, they were willing to die (expressed their explicit intent to become suicide bombers). Later on, some of the tactics used by FF in Iraq proved to be too brutal even for Iraqis. Al Qaida in Iraq (AQI) – renamed in 2006 to ***the Islamic State of Iraq (ISI)*** – embarked on an excessively brutal campaign of beheadings and suicide bombings, targeting not only Westerners or coalition forces, but also the population of Iraqi Shia. Transnational fighters volunteered to execute more than three quarters of all suicide attacks. But as Cockburn (2019) points out, the radical religious zeal was not the only driving force for such self-sacrifice. It was the harsh interrogation and imprisonment methods[13] used by the US against transnational insurgents that had provoked many so many of FF to become suicide bombers. Not the fundamentalist Islam, but disclosure of torture and abuse occurring mostly in Guantanamo, was reported by FF in Iraq as the main reason for active participation in brutal methods used by the AQI.

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[12] Rather than presenting theological arguments to justify their cause and strategies, recruiters use the "*emotive element"* of "*highlighting Muslim humiliation and suffering in video clips and audio recordings*." As Hafez (2007) points out, these online publications and recordings portray the conflict as a story in three acts: The humiliation and suffering of Muslims by Westerners (presented as constant across globe); second is the impotence or complicity of apostate Arab regimes; and finally comes the certain Islamic victory because a few righteous men have stepped forward in order to sacrifice to fight for justice.

Ultimately, it was AQI´s brutal strategies (especially those directed against Iraqi Shia) and its harsh implementation of Sharia that had encouraged opposing Sunni tribal leaders to form a united movement for the purpose of expelling the terrorist group. This successful counterinsurgency resulted in AQI´s gradual loss of its power. Many of its leaders were imprisoned or killed, but the group continued to actively conduct attacks. (Renard et. al., 2018)

At this point, FF had become rather disillusioned with the Iraqi jihad. As the conflict drew to a close, the presence and role of FF substantially diminished as many left Iraq or were seeking their way out. (Pokalova, 2020)

2.2.5. Outbreak of Syrian Civil War

In 2011, a number of anti-government protests, pro-democracy uprisings and armed clashes known as the Arab Spring challenged the stability of several authoritarian regimes in the Arab world. In Syria, demonstrations against the regime of Bashar al-Assad commenced in March of 2011. Following brutality at the hands of government security forces only provoked more people to rise up and demand resignation of the current regime. Violence escalated, and Syria descended into a civil war.

The armed group opposing Assad´s regime became soon bolstered by an influx of foreign combatants, many of whom were initially motivated to protect their Sunni "brothers and sisters" against perceived regime´s barbarity. In early stages of the conflict, the wave of FF was not uniquely numerous as it counted between 700 and 1,400 by summer of 2012, making up about 4 to 7 % of a total number of 18,000 rebel fighters. However, with time the numbers have considerably increased with a particularly steep boost among non-Arabs, especially Westerners. As estimated, up to 11,000 individuals from 74 countries engaged in the Syrian Civil War by the end of 2013. (Zelin, 2012; Zelin, 2013) According to a report by Byman and Shapiro (2014), this period witnessed the fastest mobilization of FF in the history of the modern jihadist movement. In general, the multinational composition of fighters totaled over 12,000 foreigners from at least 81 countries over the first three years of the conflict. (Barrett et. al., 2017)

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[13] In response to the 9/11 attacks

According to a UN study (UNCT, 2017), 40 % of the study participants traveled to Syria to protect fellow Muslims from the perceived brutality of the Syrian government. It was also the lack of decisive action by the international community that further motivated many FF to take matters into their own hands. The western world had been accused by many of being accepting and supportive of the inhuman atrocities against the Syrian Muslim nation. According to numerous fighters who shared their frustration in the media, the only expressed concern by the international community was a dissatisfaction with appearance of mere jihadist elements seeking to implement Islamic rule after removal of the current regime. Consequently, they justified their participation in the war as an honorable act to defend innocent Syrian women and children. (Pokalova, 2022; Vidino, 2014)

By the time the Syrian Civil War started, AQI was in neighboring Iraq in decline. In Syria, AQI´s remaining leadership saw an opportunity for revival. Therefore, an official Al-Qaida affiliate called the *Jabhad al-Nusra* (translated as *the Salvation Front*) was established in the country by one of at that time commanders, formally coming into being in January 2012. Concurrently, remnants of AQI sought to establish a safe haven in Syria as the Al Qaida central had been attempting to unify all jihadist groups in Syria under its banner (however not all followed the lead). In 2013, at that time the leader of AQI, ***Abu Bakr al Baghdadi,*** moved to the country to grab power and rebranded AQI into the ***Islamic State of Iraq and Syria (ISIS)***. (UNODC, 2019)

As Baghdadi revealed in an audio statement, Jabhad al-Nusra has been since the beginning an "*extension of the Islamic State of Iraq*". However, the leadership of Jabhad al-Nusra was not pleased by such a statement and very next day released its own announcement stating that the Front will remain as it is with no changes. With that proclamation, the leadership confirmed its unwillingness to disband the group, at the same time pleading allegiance to Al-Qaida only. Nonetheless, despite objections of the Front, the Islamic State moved to the Syrian Arab Republic anyway, expanding and drawing thousands of Jabhad al-Nusra fighters into its ranks. In such a way, the paths of two groups that shared the same roots diverged. Neither side tolerated the other´s presence in the country as they became competitors in many ways. (Bunzel, 2015)

Subsequently, on 2nd of February 2014, al-Qaida issued a statement officially dissociating itself from ISIS. The announcement asserted that al-Qaida is not responsible for actions done by the Islamic State and that no organizational ties exist between these two groups. Since that point, Islamic State of Syria and Iraq has continued heading its way as an independent Islamist terrorist organization, capturing large swathes of territory both in Syria and Iraq.

2.3. Islamic State: Declaration and Call for Hijrah

On 29th of June, Islamic State of Iraq and Syria announced formation of ***the Caliphate*** and officially changed its name to ***Islamic State (IS)***. Concurrently, the group released a number of videos, one of them named *"The End of Sykes-Picot"* declaring the destruction of the border between Iraq and Syria. (Roggio, 2014)

The move to restore a historic Caliphate, abolished by K. Ataturk in 1924, was an unprecedented shift for a militant Islamist terrorist group. With the proclamation of establishment of the Caliphate, ISIS began to enhance and amplify thoughts relating to the society it sought to create, at the same time providing the main reason for joining. Abu Bakr al-Baghdadi expressed this new focus in his first speech as ***Khalifah***, calling on Muslims across the globe to fulfill their religious obligation and make ***hijrah***[14] "*to the land of Islam*". Baghdadi declared it an individual responsibility for all Muslims to leave "*lands of unbelievers*" and join the only godly institution on the earth. (Berger and Stern, 2015) Moreover, ISIS mandated that it was *"incumbent upon all Muslims to pledge allegiance to Khalifah Ibrahim (Abu Bakr al-Baghdadi) and support him*." (Pokalova, 2020)

Many have answered the call. The restoration of the historic Caliphate proclaimed by Abu Bakr al-Baghdadi drew the most numerous wave of foreign fighters to Iraq and Syria. (Roggio, 2014). As stated by, at that time, UN Secretary-General Ban Ki-moon, there was a 70 % increase in the number of FF between the proclamation of the Caliphate in June 2014 and March 2015. (UNSG,

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[14] Hijrah is an Arabic word translated as "*emigration*", evoking the Prophet Muhammad´s historic journey from Mecca to Medina in order to escape severe persecution. Abdullah Azzam later on defined hijrah as "*departing from a land of fear to a land of safety*", an interpretation he later amplified to include the act of leaving one´s homeland of safety to take up jihad in the name of establishing IS. In general, for most extremists, the concept of hijrah and jihad are closely linked. (Berger and Stern, 2015)

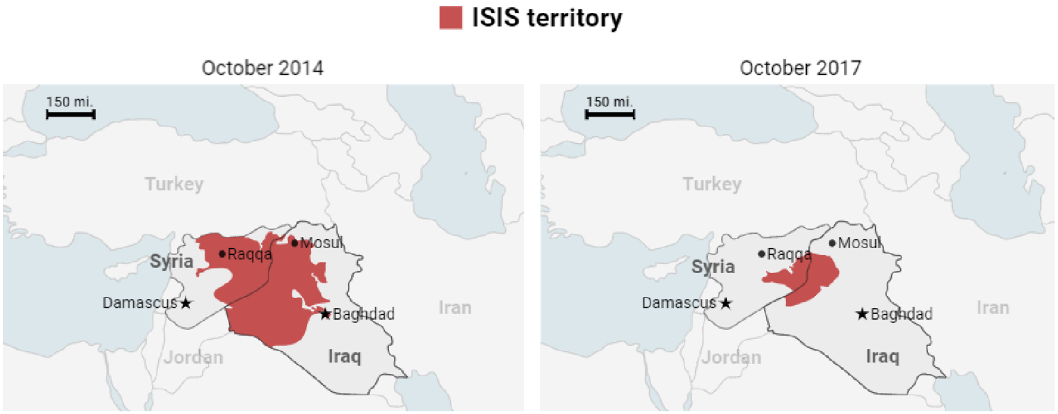
2015) By 2015, approximately 35,000 foreigners have arrived to become a part of the Islamic State creating a combined force with local Iraqis and Syrians assessed at around 100,000 fighters altogether. However, by February 2016, the number of foreign fighters with the IS decreased to estimated 25,000. (Byman, 2016; RFERL, 2016) As of October 2016, the number of FTF remaining in Iraq and Syria dropped to approximately 15,000 individuals. (INTERPOL, 2016)

At its peak in late 2014/early 2015, the Islamic State controlled over 100,000 km^2 of land with 11 million residents therein, and the flow of FTF Turkish-Syrian border was as high as 2,000 individuals per month. After this peak, the flow of FTF to the IS began slowing and by September 2016 it had dropped down to an estimated 50 individuals per month. This decrease can be explained by tightening of border controls (particularly by Turkey) as a result of adoption of SC resolution 2178 combined with worsening situation on the ground in Iraq and Syria. The Islamic State gradually continued losing its territories as ***The Global Coalition to Defeat ISIS*** has progressed with targeted airstrikes and successful actions on the ground (Byman, 2016; Cook and Vale, 2018).

As the IS could no longer portray itself as an untouchable, rising power, IS leadership reflected recent changes by adapting its rhetoric to the occurring situation. In May 2016, the "*would-be joiners"* were urged to remain in their home countries and to *"make it a month of calamity everywhere for non-believers"* rather than traveling to join the sinking Caliphate. (Reuters, 2016) This sharp change in rhetoric signified a shift of propaganda away from *hijrah* towards calls to perpetrate terrorist attacks against Western targets. Since then, IS´s strategic focus has changed from defending and expanding the territory of Caliphate, as the group started reverting back to a lethal insurgent force using mostly guerilla warfare and terrorist attacks as a its strategy. (Pokalova, 2020)

By the end of 2017, Islamic State had lost most of the land it invaded in Iraq and was reduced to occupying only 7 % of Syrian territory (in the end of 2016 IS still held almost 55 %). As can be also seen on maps presented on *Figure 1*, since its peak in late 2014, IS territories have shrunk considerably. The group had been driven out of the main urban areas it controlled, including its strategic "capital" cities Raqqa and Mosul. With the loss of seized oil fields, the group had also lost its main revenue streams. (Moore, 2017)

Figure 1: Territory held by ISIS in 2014 and 2017



(Gould and Kranz, 2017)

Islamic State´s decreasing power was expressed as well by the *Global Coalition to Defeat ISIS* led by the U.S., which stated that a "*heavily reduced but unknown number*" of IS fighters operated in Syria and Iraq at the end of 2017. A 95 % loss of ISIS territory and fewer than 1,000 IS fighters functioning within the coalition´s area of operations further led to a declaration of victory both by the government of Iraq and Syria. (Aboulenein, 2017) The terrorist group, however, continued to conduct violent attacks against military and civilian targets. In December 2018, President Donald Trump declared the defeat of IS and signaled his intention to withdraw all 2,000 U.S. troops from Syria supporting Syrian Democratic Forces (SDF). But the SDF continued its offensive and in March 2019 launched the final siege on IS troops in the city of *Baghouz*, the last holdout of the group. This successful operation formally ended the Caliphate´s claim to any territory. "*Today we announce the destruction of the so-called Islamic State organization and the end of its ground control in its last pocket in Baghouz.*", declared the SDF Commander *M. Kobani*. The Baghdadi era of IS came to an end later that year, on October 26, when the so-called Khalifah was killed in a U.S. raid in the northern part of Syria. (Lamothe and Ryan, 2019; Said, 2019)

2.3.1. Foreigners flowing into the ranks of IS helped by the ease of travel

Majority of available research suggests that around 40,000 FTF have traveled to Iraq and Syria to join the IS between 2014 and 2017[15]. The more conservative analysis lean towards an estimated number of

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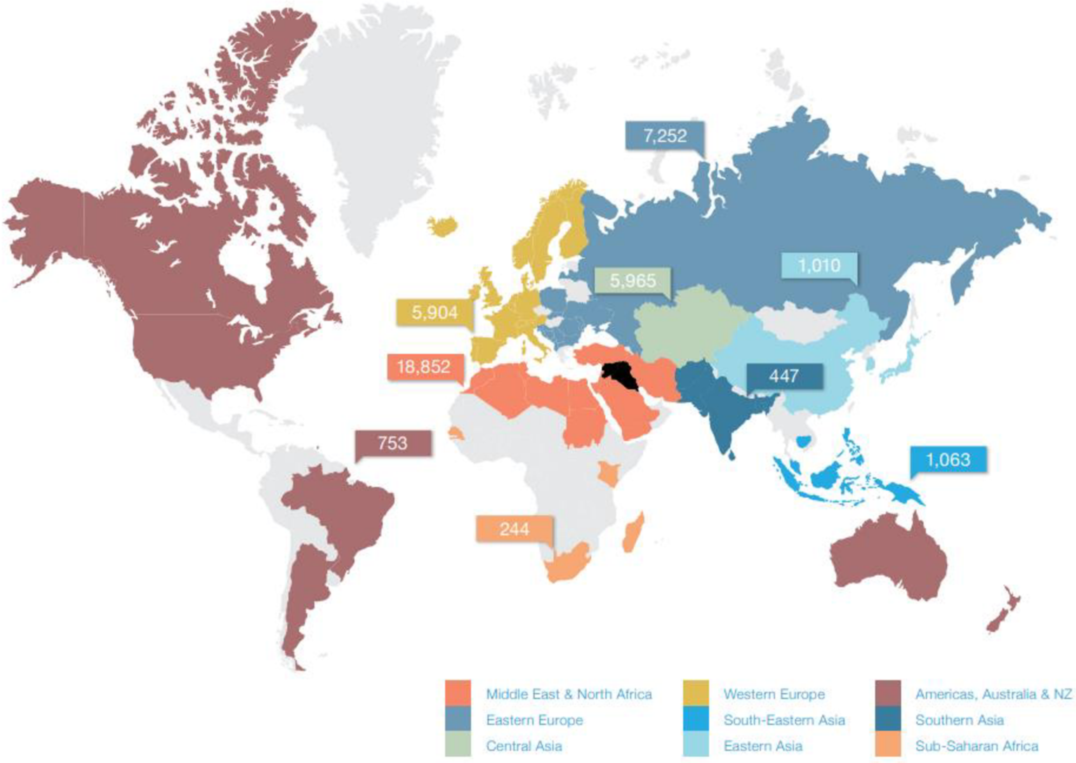
[15] Since 2017, the flow of FTF to IS has been a rare phenomenon as the State has been decreasing in its power and the border screening checks have increased and advanced in accuracy. Therefore, the vast majority of research concentrates on the time period between 2014 and 2017.

30,000, while some reporting numbers slightly higher than 40,000. (CTED, 2018; Dworkin, 2019; Pokalova, 2020; RAN, 2017)

According to an analysis by the *International Centre for the Study of Radicalization (ICSR),* at least 41,490 citizens from 80 countries traveled to join ISIS in Syria and Iraq, a quarter of which were women and minors. The actual number, however, may be significantly higher as statistics from certain countries are unavailable, may be distorted or are roughly estimated. As shown in *Figure 2*, the most numerous wave of FTF came from the MENA region, amounting to 18,852 individuals. The second highest number comes from Europe (including Russia) – 13,156 volunteers, as it is believed, 5,904 volunteers came from its Western part and 7,252 arrived from Eastern Europe. (Cook and Vale, 2018)

Figure 2: 41,490 IS affiliates in Iraq and Syria estimated by ICSR


7,252
1,010
5,965
5,904
18,852
447
753
1,063
244
Middle East & North Africa
Eastern Europe
Central Asia
Western Europe
South-Eastern Asia
Eastern Asia
Americas, Australia & NZ
Southern Asia
Sub-Saharan Africa

ICSR (Cook and Vale, 2018)

The Soufan Group (TSG) research to certain levels confirms those numbers. However, the research does not forget to underline that inevitably, whatever the source, "*the numbers quoted are subject to an inherent level of uncertainty*". Many governments do not release official statistics, and those that do, often do not disclose their methodology and may struggle to achieve accuracy. The TSG analysis suggests that at least 11,150 individuals came from Europe from which approximately 5,000 volunteers came to ISIS from the EU countries. (Barrett, 2017)

The highest number of FTF has been reported from Russia (3,417-5,000), Tunisia (2,926-4,000), Saudi Arabia (3,244) or Jordan (3,000-3950). From EU countries the most volunteers traveled from France (1,910), Germany (915-960) and Belgium (498-528). (Barrett, 2017, Cook and Vale, 2018; Renard et. al., 2018)

The multinational unprecedented movement of foreign terrorist fighters flowing to Iraq and Syria was, to a high extend, enabled by the ease of travel to the battlefields. Iraq was easier to get into than Afghanistan, as it is physically closer to the Arab heartland. Europeans and Americans, however, would often have to travel through Arab countries or Kurdish areas, both of which had a potential to disrupt their travel. Syria was for Westerners a much easier target destination, as they could easily get a train, drive or fly to Turkey, and then quickly enter the fray across the Syrian border. Turkey became a logistic hub for transfer of foreign volunteers joining the IS. Lack of visa requirement for tourists coming from the EU enabled especially European fighters to slip in among millions of tourists. Therefore, by transiting Turkey, the fighters left few if any indications for security officials to detect, especially when traveling with their families. Moreover, Jihadists inside Turkey often assisted FF, facilitating their travel with (un)intentional help from Turkish officials. The Turkish government, being supportive of the anti-Assad efforts, have often been accused of making little or no effort to stop the flow, especially during the first months of the Caliphate´s existence. (Byman and Shapiro, 2014; Fishman, 2013)

2.3.2. Islamic State successfully horrifies the World

As previous examples of insurgencies involving Jihadi fighters can confirm, the foreign fighter´s phenomenon is more than FF engagement in their first battlefield. It encompasses a whole life cycle which starts when an individual begins to consider joining a conflict in a country that is not his, continues through his involvement and culminates with his actions once he leaves that particular arena behind. In previous conflicts, one can see that foreign insurgents had usually disengaged and returned to their prior lives at the end of hostilities (never to be heard from again) or settled in new communities they had fought hard for. Only very few FF veterans have later emerged, mostly engaging in domestic terrorist activities or passively supporting active Jihadists by providing them with financial or logistical assistance. (Malet, 2013; Pokalova, 2020)

On the contrary, Jihadists proliferated through various conflict zones providing their successors not only with field expertise, but also reinforcing their frame that each conflict was one front in a global war to defend and save Islam. Others would return to their countries of origin and contribute to enhanced active propaganda and recruitment, at the same time potentially facilitating the initiation (escalation) of terrorism and enhancing the strength of terrorist groups and insurgencies. And indeed, the current worries regarding FF seem to center around the threat of possible "*bleed outs*" as jihadi veterans, equipped with extensive knowledge of fighting, training or technical skills in bombs, take their skills elsewhere. (Mendelsohn, 2011; UNODC, 2019)

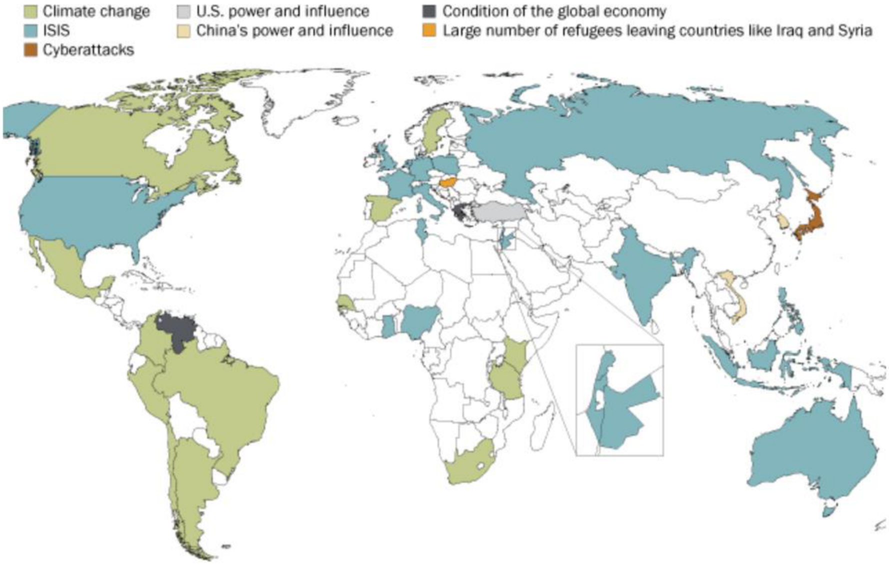
Foreign fighters traveling to Syria and Iraq became another wave of Islamist mobilization and persistence. In certain aspects, this wave extended the trajectory of jihadist armed struggles emerging mostly in the Muslim world. However, in some other ways, it either significantly developed already existing methods that have so far been only in their infancy or introduced brand new elements into Islamist foreign terrorist fighter concept.

As one part of its overarching aim to establish a global Islamic Caliphate, ISIS announced the formation of number of provinces outside of Iraq and Syria. Such provinces were located in the MENA region (Libya, Yemen or Egypt-Sinai) and also beyond (Nigeria, Algeria or North Caucasus). Affiliated groups managed control over these territories, as it has been reported that more than 50 terrorist groups around the world have pledged their allegiance to the Islamic State. (Bauer, 2016)

These affiliates have continued violent activities and suicide bombings despite IS´s decline in Iraq and Syria. Additionally, "*lone wolf attacks*", where the individual or group self-affiliates with ISIS but does not have any direct link with the Islamic State, have occurred in numerous countries including Western European ones. These attacks, often resulting in numerous casualties, have been referred to as "*leaderless jihad*" and have had a significant impact on a global community. (Donelly et. al., 2017)

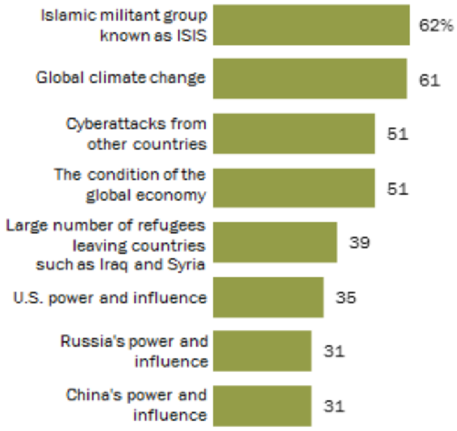
Since declaring the caliphate in June 2014, IS has conducted or inspired more than 140 terrorist attacks in 29 countries other than Iraq and Syria by February 2017. Those attacks have caused the death of more than 2,000 people and injured thousands more. (Bixler et. al., 2018) A few months later, a Pew Research Center´s survey published on 1st of August 2017, found that the fear of attack by ISIS ranked first in global concerns, just above climate change. Among the options, ISIS emerged as the most frequently cited security risk across the 38 countries polled, therefore perceived as the leading threat to a national security (Manevich and Poushter, 2017)

***Figure 3: The biggest global threat identified by survey countries*[16]**


Climate change
ISIS
Cyberattacks
U.S. power and influence
China's power and influence
Condition of the global economy
Large number of refugees leaving countries like Iraq and Syria

Spring 2017 Global Attitudes Survey (Manevich and Poushter, 2017)

***Graph 1: The biggest global threat – global medians across 38 survey countries*[17]**



Spring 2017 Global Attitudes Survey (Manevich and Poushter, 2017)

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[16] U.S power and influence not asked in the U.S., ISIS not asked in Turkey

[17] ISIS not asked in Turkey, U.S. power and influence not asked in the U.S., Russia´s power and influence not asked in Russia

The fact that the threat from what seemed to be a marginal terrorist group of a few thousand members[18] (at that time already declining in its strength) somewhere in the Middle East could worry people to such extent, is a testimony to the power of terrorism. Moreover, it is especially a testimony to the particular ability of ISIS to successfully horrify communities around the world. It has not influenced only regional events but had a significant impact on a global scale. (Barrett, 2017)

Moreover, as noticed by a leading scholar of jihadist history Thomas Hegghammer, it was foreign fighters who were overrepresented among perpetrators of the most horrific IS acts. "*They help kind of radicalize the conflict – make it more brutal. They probably also make the conflict more intractable because the people who come as foreign fighters are, on average, more ideological than the typical Syrian rebel*", expressed Hegghammer in an interview. (Holland, 2014) To a similar conclusion comes Donelly et. al. (2017), who highlights the fact that FF played major roles in many of the IS´s most egregious actions. Such examples involve detention and torture of Kurdish child hostages or genocide of the Yazidi minority in Iraq.

2.3.3. What is ISIS and who is it calling for? – Different roles within the community

There are several factors distinguishing Islamic State from other terrorist groups. For instance, whereas prior conflicts focused mainly on defeating those who invaded Islamic countries, IS made governance and establishment of a caliphate its priority. It capitalized on the vulnerable condition of state failure and power vacuums created by the Syrian civil war, and more broadly by the Arab Spring. (Donelly et. al., 2017)

In addition to ideological space where previous terrorist groups have traditionally operated, IS anchored itself in a physical territory. Such transformation attracted large numbers of individuals to become not only fighters, but above all citizens of the caliphate. Many came to stay in Iraq and Syria along with their families, in order to invest in the community and build the new country. This trend set the IS apart from previous jihadist movements. (Pokalova, 2020)

Furthermore, Islamic State further expanded the range of its supporters by accepting and later on promoting non-combatants to a *"nation-building project"*. (Renard et. al., 2018) As a result, it drew an unprecedented number of women from Western countries to join its ranks. Nearly one in five Western European volunteers were women (often traveling with their children). Those who traveled for the promise of domestic bliss and spiritual fulfillment bolstered the numbers of Europeans by almost 20 %. (Boutin et. al., 2016)

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[18] As of July 2017, the US estimated that 12,000 men including foreigners remained fighting with the ISIS (Wright, 2017)

ISIS invested considerable resources into building a state. It accumulated a lot of wealth through its control of natural resources such as cotton, oil and wheat. The group also engaged in illegal activities and was able to raise funds from religious organizations and diaspora charities, as well as through taxation. Due to its capital, ISIS became known as the world´s richest terrorist organization. And as a result, it was able to tap into the recruitment of people who were looking for employment and stability without a necessity to become fighters. (Cousseran and Levallois, 2017)

2.3.4. Focusing on PR: Effective use of social media in recruitment and propaganda

The successful recruitment has been primarily enabled by an extensive and sophisticated use of cyberspace. Although the use of internet and social media by terrorist and extremist groups is not a new strategy, the level and scope of IS online engagement has been unprecedented. Platforms such as Facebook, Twitter, Instagram or even YouTube allowed ISIS a quick distribution of propaganda and recruitment calls across the globe in real time, attracting a widespread foreign following. The group has been actively posting their contributions not only in Arabic or English, but in nearly two dozen other languages. This can be seen as a crucial innovative strategy, as it proved to be tremendously effective in ensuring the message is understandable and more personal to the audience. As it has been observed, FF flow to Syria was younger than for previous conflicts, with typical recruits being mostly between 16 and 25 years old – as one could say, a prime social media age. (Barrett et. al., 2017; Blaker, 2016; Byman and Shapiro, 2014)

In opposition to long and often boring lectures in Arabic published by Al-Qaida, digital contributions of ISIS have been characterized by advanced editing techniques, slick graphics and high production quality. Videos published by ISIS mimicked Hollywood action films and presented themselves as shocking, thrilling and "action-packed". Sophisticated propaganda presented a glamorous life in the Caliphate as well as heroic fights against the common enemy. Moreover, portraying its military successes and advantages of life under the caliphate, Islamic State deliberately showcased principally Western volunteers for propaganda purposes in a way not seen before.

Additionally, while Al-Qaida operated mostly using secretive password-protected online forums, ISIS has been publishing its messages on open platforms. An electronic magazine named *"Dabiq"* has been created and regularly published. and translated not only to English, but to many other European languages as well. Furthermore, a mobile phone application named *"The Dawn of Glad Tidings"* has been created to keep users updated with the latest news about the group, at the same time allowing ISIS to send messages to its users. (Basit, 2014)

Social media also enabled peer-to-peer recruitment with a self-perpetuating expansion through networks that eliminated prior restraints of geography on recruitment through physical spaces and institutions. It has been affirmed that especially women were quite successful as recruiters of other women and teenage girls. Because they were able to create a certain level of comfort established when closely conversing with another woman, the oftentimes romanticized idea of finding love and marriage within the IS was much easier to be successfully sold. (Blaker, 2016)

2.3.5. The other side of social media

Although social media served for the Islamic State as an important means of recruitment, fundraising, travel facilitation or propaganda; it also posed a risk for foreign terrorist fighters and provided a useful tool for security services. By publicizing their activity, individuals allowed their identification and at times also provided valuable intelligence or incriminating information. For instance, information such as group affiliation, presence when atrocities are being perpetrated, intentions or comrades could be analyzed from social media profiles. Additionally, the associated analysis of "friends" and "followers" could empower intelligence services to understand broader networks of conspiracy and influence. In other words, some (potential) FTF were totally invisible and unnoticed until they went off to join the combat and subsequently exposed themselves via the internet. (Byman and Shapiro, 2014)

3. Dealing with the Challenge: Responses to (Returning) Foreign Terrorist Fighters

With time, the flow of FTF to Iraq and Syria has gradually been reduced as a result of countermeasures states have introduced, ranging from increased intelligence cooperation to improved border security control. But most importantly, it was the military efforts of the US-led international coalition that has caused the Islamic State to weaken its power over territories held in Iraq and Syria. (Eurojust, 2020)

3.1. The Phenomenon of Returning and Relocating IS FTF

When it comes to absolute numbers, it appeals challenging to obtain reliable statistics, especially on the number of FTF killed on the battlefield. Similarly, it poses a difficulty to accurately determine the proportion of returnees and those who relocated, as some of those might have succeeded to travel without notice using false identification documents or blending in with refugees. (CTED, 2018) However, several studies have come to the following estimates.

In October 2017, a Soufan Center´s report looking at 33 countries impacted by the FTF outflow and return concluded that at least 5,600 residents/citizens had returned “home”. (Barrett, 2017) Another study by Kim Cragin (2017), based on data from 79 states, calculated that nearly 7,000 FTF perished on the battlefield and a further 14,900 had left the IS theater. Of this latter group, 5,395 (36 %) were found currently imprisoned, while 6,837 (46 %) had returned without entering the criminal justice system.

As an analysis by the *International Centre for the Study of Radicalization (ICSR),* claims, at least 41,490[19] citizens from 80 countries traveled to join ISIS in Syria and Iraq, a quarter of which were women and minors. Until June 2018, the study records up to 7,366 individuals who have returned to their home countries. Only as many as 256 of total returnees are recorded as women, and up to 1,180 recorded as minors. As it can be seen on *Figure 4*, the highest absolute number of foreign terrorist fighters returned to MENA region (3,906), followed by those who came back to Europe, amounting to 2,549 individuals. (Cook and Vale, 2018)

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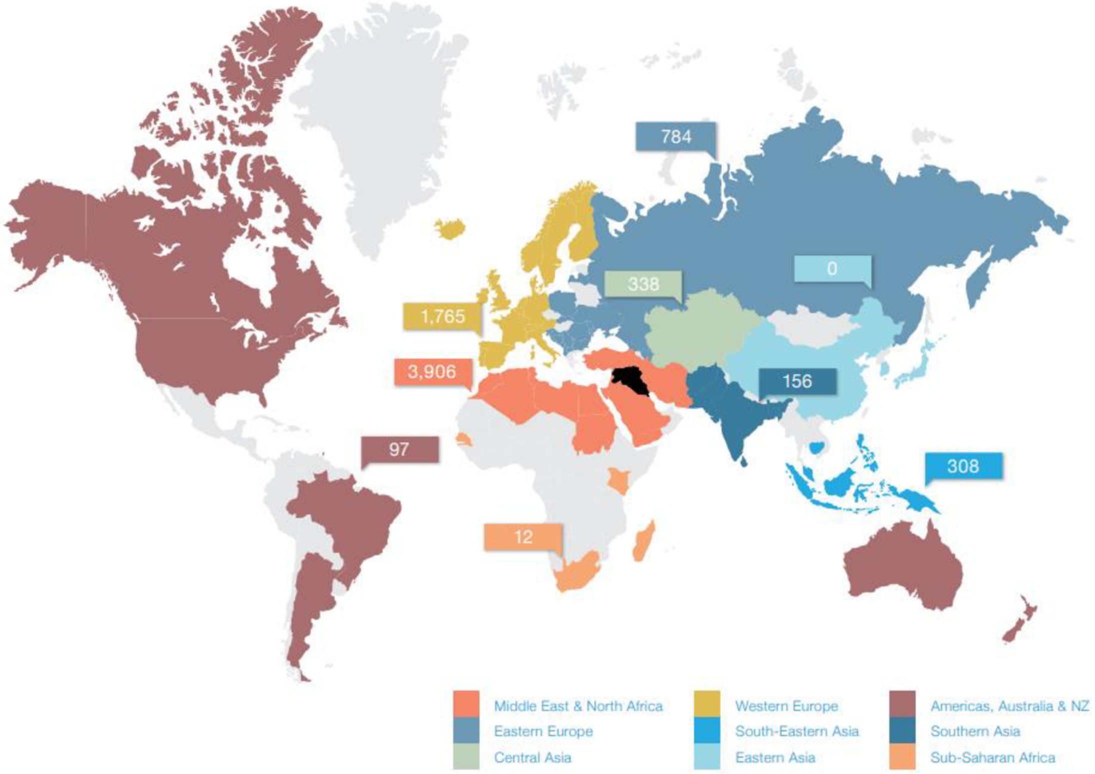
[19] The actual number might be significantly higher as statistics from certain countries are unavailable, may be distorted or are roughly estimated.

Figure 4: 7,366 foreign IS affiliates returnees estimated by ICSR


784
0
338
1,765
3,906
156
97
308
12
Middle East & North Africa
Eastern Europe
Central Asia
Western Europe
South-Eastern Asia
Eastern Asia
Americas, Australia & NZ
Southern Asia
Sub-Saharan Africa

ICSR (Cook and Vale, 2018)

Both researchers and states have also highlighted the risk posed by relocating FTF who may strengthen IS affiliates in locations outside of Iraq and Syria. Numerous cases of relocation to other conflict zones have been discovered, notably in East and North Africa and South, Southeast and Central Asia.

It was December 2018, when at that time President Donald Trump declared the defeat of IS and decided to withdraw all 2,000 U.S. troops from Syria supporting Syrian Democratic Forces (SDF). But the SDF continued its offensive and in March 2019 launched the final siege on IS troops in the city of *Baghouz*, the last holdout of the group. (Lamothe and Ryan, 2019; Said, 2019) After the last territory held by IS in Syria was liberated in the beginning of 2019, the issue of FTF desiring to return to their countries of origin became considerably relevant for states around the world. And the most pressing concern related to the return of FTF to their countries of origin/previous stay is the nature of intentions they bring back with them.

3.2. International Response to the FTF Phenomenon

Many states have not been prepared to deal with such an unexpected outflow (and return) of their citizens to Iraq and Syria. Naturally, many have turned to already existing measures responding to terrorism-related issues and tried to extend them to also cover the problem of FTF. Many of these measures allowed governments to tackle terrorist recruitment, funding, involvement in preparation of terrorist attacks, or other criminal activities. In addition, the scale of the FTF phenomenon provoked new international agreements and resolutions intended to counter the outflow of FTF and to deal with their return. (Pokalova, 2020)

One of the earliest international responses dates back to 2013, when the Netherlands along with Morocco partnered in developing some non-binding guidelines for best practices, aiming to help the states approach the FTF issue. This initiative resulted in adoption of the *Hague-Marrakech Memorandum on Good Practices for a More Effective Response to the Foreign Terrorist Fighter Phenomenon* by the Global Counterterrorism Forum (GCTF) in September 2014. The agreement covered four main areas, namely: radicalization into violent extremism; facilitation and recruitment; travel and fighting; and return and reintegration. (GCTF, 2014) Measures ranging from information sharing and developing counter-narratives, to strengthening mechanisms for investigation and prosecution were outlined. Additionally, in 2015, they were further enhanced with guidelines on best practices in dealing with returning FTF, as an Addendum to the Memorandum focusing solely on FTF return was developed. (GCTF, 2015)

3.2.1. United Nations Approaching the FTF Challenge

On UN level, the Resolution 2178 was adopted in 2014, incorporating many principles laid out in the Memorandum (and its Addendum)[20]. The Resolution described FTF as "*individuals who travel to a State other than their States of residence or nationality for the purpose of the perpetration, planning, or preparation of, or participation in, terrorist acts or the providing or receiving of terrorist training, including in connection with armed conflict"*. (UNSC, 2014) The 2178 Resolution further referred to individuals affiliated with IS as "*foreign terrorist fighters*", thus equating foreign fighting in Iraq and Syria with terrorism. However, as Pokalova (2020) explains, the lack of clear definitions within the

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[20] For instance, the Resolution encouraged states to devise measures to prevent radicalization, focus on the recruitment strategies, interdict FTF border crossing, and disrupt financial support. Additionally, it called for measures that would ensure effective prosecutorial mechanisms, enhanced by programs focusing on rehabilitation and reintegration. The 2178 Resolution specifically highlighted the value of community-oriented approaches. It also aimed at the prevention and suppression of FTF activities, movement and travel. (Pokalova, 2020; UNSC, 2014)

Resolution along with imposing legal obligations on member states to adapt new provisions and measures, led to variations across FTF measures, as governments, not having any conceptual clarity of the threat, interpreted the obligations in various ways.

In July 2015, the UN Counter-Terrorism Committee organized a gathering in Madrid, in order to assist governments in forming appropriate legislation in compliance with the 2178 Resolution. The gaps in capacities of states in stemming out the outflow of FTF were discussed, and best practices focusing on deterrence of recruitment, prevention of travel and prosecution of FTF returnees were shared. As a result of the meeting, participating states developed specific guiding principles intended to serve as a practical tool in an effective approach to challenges related to FTF. (UNSC, 2015)

Once the outflow of FTF dropped and returnees gradually started to become a more pressing concern, the attention of the international community turned its focus on those leaving the IS conflict zone as well. In 2017, UNSC unanimously adopted the Resolution 2396, which dealt with the phenomenon of relocators and returnees. It expressed serious concern over the threat posed by returning FTF, as it acknowledged that FTF relocators and returnees had already planned, organized, and carried out attacks outside of Iraq and Syria, including in the West. Significant risks posed by IS sympathizers and supporters regardless of their location were pointed out as well.

The 2396 Resolution entailed a comprehensive approach that would contain improved border security and intelligence sharing, as well as judicial measures and reintegration strategies. And although the effective prosecution of FTF is seen as necessary, the Resolution highlights the importance of individual assessment of cases, as they require tailored legislative approach with rehabilitation and reintegration interventions. (UNSC, 2017)

Subsequently, to effectively tackle the phenomenon of returnees and relocators, a review of the Madrid Guiding Principles were requested in 2018. Participating states reaffirmed the relevance of all points and additionally developed an Addendum that presented 17 further best practices specifically linked to the return of FTF to their countries of origin/previous residence or their relocation to some other third countries. (UNSC, 2018)

3.3. Measures Adopted by States in Reaction to FTF

In response to international reactions, many Western countries have applied new legislative measures against foreign terrorist fighters. Some governments passed new cybercrime laws that enhanced the rights of authorities to monitor potential threatening internet activity, and to prevent its use by the Islamic State. Others created extended databases and applied strategies to track, designate, and take down certain websites used for FTF recruitment. Additionally, freezing of financial assets was a common procedure used in suspected cases. Several countries devised measures to cancel or seize passports and other travel documents to prevent FTF from traveling. Certain governments also updated citizenship legislation allowing for citizenship revocation in cases of potentially returning FTF. Western governments have explored several strategies to respond to the issue, as well as introduced many new legislative measures aiming to tackle both the departure and return of fighters, including those specifically designed to prevent the outflow of individuals. (Mehra, 2016; Pokalova, 2020; RAN, 2017; UNODC, 2021)

3.3.1. Soft Preventive Measures

Soft preventive measures are hardly an innovative measure, as many countries had them in place following the 9/11 attacks. Some of these strategies have been later simply adjusted to the emerging foreign terrorist fighter threat. Such measures placed an emphasis on prevention of radicalization or countering extremist (or terrorist) propaganda, aiming to achieve the results predominantly through community engagement and empowerment, cooperation with religious groups or community policing. (RAN, 2018)

In the UK, following the events of 9/11, one of the earliest prevention programs was established in 2003 and has become a significant pillar of the later established broadened strategy responding to the FF issue. In 2007, the UK for the first time piloted the Chanel program[21] which focused on providing help to vulnerable individuals at early stages and at the same time preventing them from becoming foreign (terrorist) fighters. The Channel allowed potential FTF to be referred to the appropriate authorities and then enabled a proper assistance to such individuals, provided by highly trained specialists through conducting necessary investigations. In 2014, around the peak of the FTF outflow, a 58 % increase in referrals was reported. (UK Parliament, 2015)

Canada principally focused on prevention of radicalization and violent extremism through a comprehensive community approach as well as targeted individual approach to potential vulnerable persons. As a response to the immense FTF outflow to Iraq and Syria, in June 2017, Canadian government launched a Centre for Community Engagement and Prevention of Violence. A perceived importance of the occurring phenomenon can be seen in the funding efforts, as the Centre has been allocated with a budget of $26.7 million over five years and an additional amount of $8 million annually thereafter in order to counter radicalization to violence. (Pokalova, 2020)

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[21] Preventative work with communities was also a crucial part of the UK de-radicalization strategy. *"It is urgent that new partnerships are developed with mosques and other community groups and that they play a key role in Prevent counter-terrorism programs. We need to reassure them that they will not be 'toxified' by helping the authorities to identify those who they suspect of radicalization and by engaging with these individuals",* stated the UK Parliament (2015).

In France, the prevention of violent radicalization efforts date back to 2014. The counter-terrorism strategy through prevention of violent extremism and radicalization has been introduced at the central (government) as well as local (prefectures) levels. It aimed to cover primary prevention through anticipation of the risk; secondary prevention – mitigation of the risk and support to already radicalized individuals; and lastly, tertiary prevention by using tools such as monitoring of radicalized individuals to prevent them from perpetrating violent actions or Countering Violent Extremism Measures. French authorities also significantly focused on countering the recruitment of vulnerable groups, especially targeting the work of so-called *"preachers of hate"*. (Lahnait, 2021)

Furthermore, to prevent recruitment of potential foreign terrorist fighters, the soft preventive strategies encompassed efforts in dealing with the extremist (radicalized) Internet content. Numerous governments adopted programs designed to enhance social media monitoring capabilities or to enable authorities to reduce availability of extremist material on the Internet. Some others introduced various campaigns tackling the issue. For instance, in 2013 the US State Department launched a Twitter campaign called *"Think Again, Turn Away"* in order to counter extremist narratives in an online space. (Katz, 2014)

Challenges Surrounding Soft Preventive Measures

Undertaken comprehensive strategies aimed to diminish the occurring threat (thus, to achieve security) through the individual/community-centered approach aligned with human rights protection. Several components of human security can be observed as well, such as *political security* (emphasizing protection of human rights and providing a voice for minorities) or *community security* focusing on protection of religious and cultural identity along with assuring the provision of respect and dignity of minority groups.

However, despite various efforts, most soft preventive measures have proven to be insufficient and criticized as ineffective, since they failed to prevent the very rise of foreign terrorist fighters. The outflow of individuals traveling to Iraq and Syria had occurred despite a number of programs that had already been in use. (Mehra, 2016) As Pokalova (2020) points out, some governments have been blamed for using soft preventive strategies to spy on targeted suspect communities, and vulnerable minority groups have complained about unfortunate stigmatization caused by various programs. However, many preventive programs are still relatively young, therefore they might have not reached their maturity point yet, for their outcomes to become evident. It has also been long established that soft preventive measures alone are not sufficient to cope with and combat terrorist recruitment. They rather provide venues for alternative approaches allowing governments to make their preventive strategies more comprehensive.

3.3.2. Prevention and Restriction of Travel

Numerous governments primarily focused on stopping individuals from actually becoming FTF in the first place. Preventive travel restrictions adopted in legislation were applied, aiming to directly disrupt the physical ability of potential foreign terrorist fighters to leave their country of origin (residence). In case of suspicion, a temporary withdrawal, suspension or confiscation of travel documents might have taken place. Some individuals have also been placed on "no fly" lists, which allowed an immediate disruption of their travel. (Pokalova, 2020; UNODC, 2021)

The UNSC resolution 2178 (2014) mandated Member States to require all airlines operating on their territory to make passenger information available for relevant authorities. Following the call, a number of states also implemented their own advanced passenger information systems that aimed to assist in efforts to detect attempted departures of aspiring foreign terrorist fighters. Understandably, the efforts to suppress the FTF flow to Iraq and Syria put the greatest scrutiny especially on Turkey, as its more than 900km long shared border with Syria proved to be the most frequent route used by foreigners to join the IS theater. (Sengupta, 2014)

At the EU level, Focal Points travelers system was implemented by Europol, and later on, in 2013, transformed into the so-called Analysis Projects designed to collect data on FTF travel. During its first three years of implementation, the system gathered 21,700 person entities which included 5,353 records of verified FTF cases. Additionally, Europol further enhanced its capability to track (aspiring) FTF movements through a cooperation agreement signed with its US counterparts. (ECTC, 2016; Europol, 2015)

At the national level, countries adopted legislation enabling them to restrict movement and possible departure of aspiring foreign fighters, traveling with the aim of engaging in terrorism abroad. For instance, the German authorities have, by the *Criminal Code amendment* passed in 2015, obtained powers to refuse or revoke both passports and national IDs to suspect individuals. Instead, such persons were issued surrogate documents valid for domestic travel alone. Aspiring FTF could lose their documents enabling them to travel internationally for up to three years. (Pokalova, 2020; Sengupta, 2014)

Similar measures of suspension or cancelation of travel documents were applied in Australia according to its *Counter-Terrorism Legislation Amendment (Foreign Fighter) Act*, introduced in 2014. Until 2018, the Australian authorities allowed cancellation of passports in approximately 240 cases of individuals being suspected of being linked to terrorist organizations. (Cunningham, 2018) France also strengthened its legal framework against terrorism through Law 2014-1353, allowing authorities to ban individuals from leaving France if serious grounds existed to believe that they were planning their departure with a terrorist purpose in mind. The ban could be enforced for a period of six months with a possible extension for up to two years. The new provision was applied for the first time in February 2015, when French authorities confiscated travel documents of six men in their 20s whom intelligence services believed were planning an imminent departure to Syria. (Global Legal Monitor, 2015)

Correspondingly, aspiring British FTF could also lose their travel documents for a period of maximum 30 days, according to the new *Counter-Terrorism and Security Act* adopted in February 2015. The Law enabled security services to seize and retain travel documents during border checks in case of reasonable, serious suspicion of a person´s intent to travel to engage in terrorism-related activities. In a case of accumulating incriminating evidence in subsequent investigation, a particular suspect could face further travel restrictions under the *Terrorism Prevention and Investigation Measure Act* (2011). (Pokalova, 2020; UK Parliament, 2015)

What Was the Outcome?

The prevention of travel measures might have proven to be a useful tool to prevent immediate departures of aspiring FTF. Yet, they have failed to tackle the deeper aspect of the FTF phenomenon and seemed less effective in the long term. Various individuals who wanted to join the IS forces in Iraq and Syria but were denied the opportunity to travel there, have instead engaged in a domestic terrorism. Among such examples, an Australian citizen named Hassan Khalif Shire Ali might be presented. Shire Ali had desired to leave for Syria, yet the attempt proved to be unsuccessful, as his passport got canceled. Therefore, instead of physically joining IS in Iraq and Syria, he decided to perpetrate a deadly stabbing attack in Melbourne, on November 9, 2018. Islamic State immediately claimed responsibility for this terrorist attack. (Burton and Westbrook, 2018)

3.3.3. Criminalization of Foreign Terrorist Fighting

Following the UNSC 2178 Resolution (2014), states were required to criminalize the full range of conduct related to FTF, including involvement in preparation or assistance to crime. Therefore, another widely adopted measure aiming to deter individuals from traveling to Iraq and Syria was the adoption of criminal charges for foreign fighter travel. This strategy was supposed to discourage individuals from joining the combat in the IS theater under the threat of facing consequences upon their return, such as detention or arrest. It was the legal criminalization as a preventive measure that also allowed later prosecution of FTF returnees.

For the majority of states, traveling abroad to take part in an armed struggle has not constituted a criminal offense. Yet at the same time, the criminal measures that have already been in use allowed prosecution of aspiring FTF in numerous cases. The criminal proceedings have often taken place following charges such as participation in terrorist training, provision of financial assistance to terrorist groups or participation in terrorism-related activities. A broad array of existent legal acts provided governments with ability to prosecute aspiring FTF, FTF recruiters and FTF returnees without the necessity of introducing additional new legislative measures. (UNODC, 2021)

Among countries that applied existing legal measures to deal with the FTF issue were the United States. For instance, one of the aspiring FTF, Nicholas Teausant, have been on his way restricted to travel further to the Middle East and have consequently been charged with providing material support to a recognized, listed terrorist organization. His sentence amounted to twelve years in prison. (The US Department of Justice, 2016) Other countries such as Denmark or the Netherlands, have managed to sentence their citizens on a basis of preparation of a terrorist attack, or under murder charges.

On the other hand, in compliance with the 2178 Resolution, other states have introduced a number of new legal measures specifically criminalizing foreign fighter travel. Numerous countries criminalized foreign fighting based on the FTF intent to leave the country and engage in terrorism-related activities abroad, and such strategy enabled governments to lead pre-emptive investigation and prosecution of aspiring FTF. Some other countries banned the very travel abroad to theaters of operations of terrorist groups with the exception of a legitimate purpose, such as journalism or humanitarian work. To travel to certain areas, individuals had to have a prior permit from the authorities, otherwise they would face legal consequences. (RAN, 2017)

For instance, in 2015, Denmark adopted a new legislative measure that made fighting with a hostile armed group an offense punishable by a life imprisonment. To travel to certain areas, Danish citizens had to possess an official approval by the government. Similar provision was introduced by Australia in 2014, stating that a person who enters a foreign country with the intention of engaging in a hostile activity risks a life imprisonment, making an exception with regards to serving in the armed forces of the government of a particular country. Moreover, Australians could be criminalized for the mere presence in “declared areas”, designated territories by the Foreign Affairs Minister, where a terrorist group engages in a hostile activity. Every person entering and remaining in the area without the legitimate purpose faced imprisonment for ten years. Similarly, also the Saudi king issued a rare decree establishing it a criminal offense to join a foreign war. (Pokalova, 2020; Sengupta, 2014)

The level of success of presented criminalization efforts in deterring FTF is difficult to evaluate. Although most legislative measures were adopted after the UNSC Resolution 2178 (2014) and indeed, the outflow of FTF steadily declined especially after 2015, it is nearly impossible to assess to what extent the decline was associated with new criminalization initiatives and to what degree other intervening factors[22] played a role. Additionally, it has been proved that some individuals still defied the laws by using fraudulent documentation. (Mekhennet and Miller, 2016) The criminalization measures also hardly affected those who have never intended to return back home and burned their travel documents upon arriving in the IS theater. (Malik, 2014)

However, it has been observed that criminalization initiatives deterred family and friends from reporting[23] observed and known cases of radicalization (or support of the Islamic State) or their already missing loved ones. Therefore, one of the outcomes of criminalization has been hindering the efforts with community members in detecting and curbing radicalization.

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[22] To name a few, around the same time period IS started losing control over its territories on the ground. The strategy of IS slightly shifted, as the terrorist group started encouraging its supporters to stay at home and bring jihad there. Moreover, Turkey implemented more effective border security checks disabling numerous aspiring FTF to cross its border with Syria. Finally, successful military interventions of the US-led coalition also played its role.

[23] In the UK (2013), the mother of Yusuf Sarwar decided to go to the authorities after she realized her son left for Syria, hoping to receive an effective help from the authorities to get her son back. The family worked with the police, however, when Sarwar was immediately arrested upon his return, prosecuted and given a prison sentence, his whole family felt betrayed. Sarwar’s mother shared: *“This is not justice. They said I was doing the right thing, that when my son came back, they would try to help, but this terrible sentence – all they have done was to set me against my son.”* She continued: *“What kind of person would go to the police if they think their son will get 12 years in prison? Nobody wants to do that. I did not want that”.* (McVeigh, 2014)

3.4. Measures Adopted by States in Reaction to FTF (Potential) Returnees

Although several preventive measures have taken place to prevent the outflow of foreign terrorist fighters, yet more than 40,000 individuals decided to leave their countries of origin (residence) and join the mission of the Islamic State in Iraq and Syria. International community as well as particular governments of states "unwillingly involved" in the matter, had to adapt to this challenge by introducing new measures and strategies not only tackling the departing individuals, but especially the returning ones. Since numerous foreigners have managed to leave and engage to various extent in terrorist activities, the threat they posed has changed and the focus had to be predominantly placed on foreign performers within the theater of the Islamic State.

3.4.1. Elimination

Several Western governments attempted to avoid dealing with returning FTF through preventing their return. Unofficially, a policy of elimination (mostly men) on the battlefield seemingly became one of the accepted approaches. (Cook and Vale, 2018) Taking advantage of the rules of the war, numerous countries favored the *"shoot to kill"* approach, such as the United States, France, Australia or the UK. Although not openly acknowledged, those countries relied on targeting their citizens in special operations ground missions, drone strikes or coalition airstrikes. (Pokalova, 2020)

Using elimination strategy, governments were hoping to avoid challenging and costly rehabilitation, along with thorny prosecutions of the returning FTF. And although this approach was rarely stated as an official policy, it became apparent through various remarks by government officials. Brett McGurk, the US special envoy to the coalition against ISIS, was for instance recorded saying: *"Our mission is to make sure that any foreign fighter who is here, who joined IS from a foreign country and came into Syria, they will die here in Syria".* (Chappell, 2017) The drone strikes were a popular US choice to target foreign combatants, who were filed on a government's list of militants to be killed in Iraq and Syria. (Starr, 2015)

France had a similar approach to its citizens fighting in the IS ranks. Significantly concerned about the numerous IS-related attacks on the French soil, government officials aimed at keeping their FTF from returning to France. As stated by French Minister of Defense, F. Parly, *"what we want is to go to the end of this combat and of course if jihadists die in the fighting, then I would say it is for the best".* (Local, 2017) Also the former President Francois Hollande admitted to having a *"kill list"* and giving personal orders to eliminate various individuals on this list. Names of those individuals have been shared with Iraqi counter-terrorism troops who helped track and kill French FTF. (Abi-Habib et. al., 2017)

In the same vein, the former Prime Minister of Australia, M. Turnbull, warned Australians FTF that they would be specifically targeted. As it was later explained by the Home Affairs Minister P. Dutton, "*the determination of the government is to try and keep Australia as safe as possible and we do that by keeping these people far from our shores so if we can deal with foreign fighters away from our shores, we do that*". (Borys and Yaxley, 2018)

Finally, the former UK Defense Secretary G. Williamson presented his position by saying: *"…any terrorist whether they come from this country or any other, should ever be allowed back to this country…a dead terrorist cannot cause any harm to Britain"*. This position was supported also by, at that time PM Theresa May, who described individuals fighting for the IS as *"legitimate targets"*. (Merrick, 2017) Similarly to the US or France, the UK operated with a certain list of approved *"legitimate targets",* as Britain´s Special Air Service was supposedly given a *"kill list"* of individuals to eliminate. And since the UK government worked closely with the US in sharing intelligence, a number of Britain citizens have been eliminated in US drone strikes. For instance, the infamous Jihadi John (*Mohammed Emwazi*) was killed in a US drone strike in November 2015, or a British IS recruiter Sally Jones was eliminated in US drone attack in June 2017. (BBC, 2016; BBC, 2017)

Security and Moral Aspects and of FTF Elimination

The elimination of FTF on the battlefield enabled in numerous cases to avoid costly detentions and lengthy trials dictated by domestic rule of law high standards. At the same time this *"shoot to kill"* approach, often named as "targeted killings" or "extrajudicial executions" has been followed by criticism coming from various sides.

From the perspective of states whose citizens have been eliminated, this measure might seem almost ideal as it has been a tool for literal "removal of the threat". Aspects of traditionalist mindset regarding security may be observed, as the state is portrayed as the main referent object that is to be secured from the external threat represented by radicalized combatants. Keeping the threat outside the state´s territorial borders appears to be the main goal of such strategy. Additionally, by removing certain individuals, governments avoid lengthy and challenging procedures, costly rehabilitations or possible public opposition. Similarly, elimination can also be considered beneficial for Iraq and Syria, as probable source of further instability is removed.

Yet from the human security concept´s point of view, the issue brings much controversy. Considering other (possibly) involved in the matter individuals (citizens of particular states), their protection from direct physical threat and possible harm to their safety and integrity might be ensured through elimination of possible source of the threat. Yet focusing on FTF themselves, the matter rather presents itself in a whole new light. Such measure contradicts the fundamental principles of basic human rights which are supposed to be in their universality implemented and applicable to all individual human beings. Furthermore, human rights organizations heavily questioned circumstances under which targeted individuals had been eliminated, as well as pointed out that some states exploited the chaos of war to bypass adhering to the adamant domestic demands of the rule of law.

In addition to moral and legal concernment, targeted eliminations of FTF have produced several long-term unintended consequences. The unofficial policy has fostered the manipulative image of martyrdom, as those killed by Western allies were praised and portrayed as heroes dying for the right cause. Further, the elimination of FTF had failed to deal with remaining relatives and friends, who might seek revenge or through radicalization turn to violence. (Pokalova, 2020)

3.4.2. Revocation of Citizenship

Several governments have also strived to prevent FTF from returning by stripping them of their citizenship.[24] From as early as 2014, numerous countries have passed legislation to revoke citizenship for those proved guilty of travelling to different country to join a terrorist organization. Some countries applied this measure to cases of naturalized individuals who also held a citizenship of another country. Others extended this policy to dual citizens born in the country. Lastly, some states went even further and revoked citizenship from its nationals with no apparent other citizenship. (Cook and Vale, 2018)

In France, only naturalized citizens could forfeit French citizenship if sentenced for *"ordinary or serious offence which constitutes an act of terrorism"*. This policy did not extend to born French citizens, even if they had some other nationalities. As a response to the 2015 Paris attacks, the government debated the possibility of including French-born dual nationals in the measure. Nevertheless, the proposal led to much controversy which eventually caused the discussions over changing the constitution to be dropped. (Willsher, 2016) Similar conditions have been applied to citizenship revocation measures in Belgium or the Netherlands.

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[24] Among such countries was Norway (The Local, 2014), Canada (Globerman, 2015), Switzerland (Miller, 2016), Germany (Huggler, 2016), Denmark (The Local, 2016), Australia (Safi, 2016), Netherlands (Pieters, 2017) or the United Kingdom (Travis, 2017).

In a number of other countries, dual nationals could be stripped of their citizenship regardless of the way they acquired it. In Denmark, the provision applied equally to Danish-born dual or naturalized citizens unless the citizenship revocation would leave an individual stateless. In Australia, the measures adopted made it legal to revoke Australian citizenship from dual national minors as young as 14 years of age. Australian-born dual citizens were no exception. (Safi, 2016)

Perhaps the most controversial citizenship measures were developed by the United Kingdom. Firstly, the 2015 Counter-Terrorism and Security Act enabled the government to apply *Temporary Exclusion Orders,* which allowed the UK to keep British citizens away from its borders for a maximum of two years. Later on, the British government adopted legal measures that authorized citizenship revocation even from UK nationals holding no other citizenship, therefore leaving such individuals stateless. (Pokalova, 2020) By 2017, more than 150 suspected British FTF had been stripped of their citizenship, including the unfamous IS execution cell composed of British nationals called *"the Beatles"*. (Davies, 2019; Guardian, 2017)

Intentions and Challenges Connected to Citizenship revocation

The revocation of citizenship proved to be a highly controversial measure when dealing with the FTF phenomenon, especially due to often lacking transparency and concerns of arbitrariness. The argument used for implementing such a measure was most of the times connected to the alleged aim to protect national security from the outside threat that certain individuals themselves represent. The case of, at that time 15-year-old, Shamima Begum might serve as an example, as when she expressed her desire to return to UK along with her newborn (who later on died being three weeks old), it has been refused by the Home Office. The spokesman stated: *"The priority is the safety and security of Britain and the people who live there"*. In order to protect the country, *"the Home Secretary has* (and used) *his power to deprive someone of their citizenship where it would not render them stateless*[25]*"*. (BBC, 2019; Dodd and Rawlinson, 2019)

The measure itself was criticized for its discriminatory nature as it disproportionately affected citizens with immigrant backgrounds. (Pokalova, 2020) Moreover, the possibility of rendering a person stateless became especially antagonistic, since it contradicts the fundamental principles laid out in the Universal Declaration of Human Rights, the Article 5 of which claims that *"everyone has the right to a nationality"*. (UN, 1948)

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[25] According to the Home Office, Begum's parents are coming from Bangladesh, so she could apply there for a citizenship

The effectiveness of such a measure was also questioned, as instead of addressing the problem, it displaces the issue and forces other governments to deal with the consequences of radicalization which occurred in another state (thus also creates diplomatic tensions). Finally, it forces FTF to relocate to third party countries, which carries its own danger. FTF may continue spreading their international terrorist networks and incite terrorist activity targeting their countries of origin from various locations. In such case, states might face much more serious threats to their national security compared to the strategy of controlled repatriation and later prosecution (Cook and Vale, 2018; Pokalova, 2020)

As similarly argued by Malet (2015) who draws lessons from historic examples of Islamic foreign combatants, in previous cases of jihadi fighters, the primary factor accounting for their persistence and continuous engagement in other armed conflicts was not one endogenous to their movement. It was rather the policies of their home (or host) countries that prevented coordinated reintegration and *"allowed cohorts of stateless actors to perpetuate in weakly-governed conflict zones elsewhere"*. Such policies have later in time only backfired on the international community, creating significantly more serious and extensive threats both to international community and national security of particular states.

3.4.3. Deportation to Third Countries

Although quite controversial, there have been cases of detained FTF affiliated with the Islamic State who have been expatriated to third party countries. For instance, Kim Cragin (2017), a senior researcher from the US National Defense University, highlighted 2,678 "unaccounted for deportees" who had returned from the IS theater to Turkey, been detained by Turkish authorities for up to a year, and were then subsequently banished (and not incarcerated) to states to which they do not hold citizenship, sometimes even without the knowledge of local authorities. These third-party countries enjoy visa-free agreements with Turkey and include for example Ukraine or Malaysia. (Hromadske International, 2017; Reuters, 2017)

These IS FTF ending up in countries not expecting them create an exceptionally problematic issue, as many FTF may disappear from the eyes of security services and it might open countless opportunities of engagement in illegal activity, and at the same time posing a threat to national security of states. States aiming to protect their territory from the perceived external threat by leaving it outside their borders merely displace the issue, which might in the long run only intensify the security challenges posed by FTF.

3.4.4. Rehabilitation

In contrast to dealing with returning FTF by preventing them from doing so, numerous countries have implemented various rehabilitation and reintegration programs aiming at assisting FTF returnees in coming back to their regular lives. Considering numbers of FTF returnees who cannot be prosecuted due to the lack of evidence, have already served their time in detention centers/prisons, or those who are seen as individuals not posing a threat to society, rehabilitation programs might assist in reducing the probability that those FTF will return to engaging in illegal (terrorist) activity. (Pokalova, 2020)

Depending on the particular goal of a rehabilitation program, it might strive to prevent (further) radicalization, promote disengagement or assist with effective reintegration into the society. Other programs are designed to reach individuals who could not be prosecuted for the lack of evidence yet their engagement with Islamic State is clear. Some others are aiming to deal with FTF returnees who have already served their sentences in prison and are about to be released. Numerous rehabilitation programs also tackle the problem of psychological trauma and PTSD, at the same time helping returnees with employment or housing. (Holmer and Shtuni, 2017)

One of the earliest rehabilitation programs for FTF returnees was pioneered in Denmark. In addition to the concrete legal instruments such as arrests and prosecution, Danish authorities also made use of individualized assessments. As Mayor of the Municipality of Aarhus stated, *"we cannot afford not to include them back in our society and make sure that their path of radicalization is changed, so they can be an active part of society"*. The Danish authorities therefore approached the phenomenon aiming to distinguish whether an individual needed to be prosecuted or if the FTF returnee had better chances at rehabilitation through the means of tailored assistance. (Higgins, 2014)

Other concrete examples of rehabilitation initiatives include a Dutch rehabilitation program focusing on returning FTF and individuals desiring to leave a terrorist organization in a voluntary basis. Another program designed by France aimed at both radicalized youth and FTF through four specifically designed phases, including in the strategy the state as well as civil society. On the other hand, Saudi rehabilitation programs specialized at providing counseling to detained FTF, and after the release of detainees from state custody continued with educational and religious training. (Mehra, 2016)

In Germany, the federal government actors partnered with local organizations to seek ways of assisting returning FTF. According to German legislation procedures, investigation along with prosecution of returnees were inevitable. However, at the same time, authorities invested into supplementing those legislative measures with reintegration initiatives whenever it was possible. (Winter, 2019) Furthermore, in the UK, similar initiatives focusing on deradicalization as well as rehabilitation were introduced. In 2016, a pilot project called the Desistance and Disengagement Program (DDP) was launched, and in the following year alone, more than 100 individuals went through it. The DDP joined together government ministries, probation services and civil community organizations, and they all worked together in developing tailored interventions with regards to (returning) FTF. The main goal of the program was disengagement of FTF from terrorist activity and their reintegration into society. The means through which the DDP aimed to achieve its purpose included mentoring, psychological counseling, or theological (and ideological) support. Participants were subjects of regular assessments to determine the risk they supposedly presented and to evaluate the progress they have made. However, what distinguishes the DDP from other programs is the fact that it was in most cases mandatory, and non-compliance was punishable. (Hamilton and Ford, 2018; Pokalova, 2020)

From a general perspective, rehabilitation programs were not meant as a replacement for prosecution. They were rather designed as supplementary interventions in some of the FTF cases, to provide with a “second chance” (of ordinary life) those who were deemed low-risk for the society. However, they can be extremely resource intensive, and might be the subject of criticism since they seem to treat FTF far better than other (less dangerous) individuals, especially when conducted in places outside prisons. (Barrett, 2017)

As Pokalova (2020) points out, rehabilitation and deradicalization programs remain significantly difficult to evaluate, as it is almost impossible to connect the lack of engagement in terrorist activity with participation in such programs. Moreover, the challenge in analyzing effectiveness of deradicalization programs is touched upon by Horgan and Taylor (2012), who underline that disengagement from violence is not indicative of abandonment of the ideology. Finally, it is challenging and costly to monitor program graduates, particularly in the long term. Many programs are also still relatively young, and their aftermath might not be observable until years down the road.

3.4.4. Prosecution of FTF Returnees

Prosecution of foreign terrorist fighters remained the primary consequence of joining Islamic State´s activities in Iraq and Syria. Facing the FTF returnees, some countries adopted new legislative measures implementing criminal charges for foreign fighting. In some different cases, existing criminal laws proved to be sufficient enough. Other jurisdictions have been prosecuting FTF before they traveled, others faced arrest upon their return, and finally, some have resorted to prosecutions in absentia. Many completed prosecutions of FTF proceeded on terrorism-related charges, while numerous other charges occurred in reference to war crimes or inciting hate. Nevertheless, certain challenges have come to the surface regardless of the prosecution route. (Furlan and Hoffman, 2020; UNODC, 2021)

Addressing Particular Challenges of Prosecution

Legal prosecution of foreign terrorist fighters appears to be one of the most effective approaches when it comes to addressing the phenomenon yet brings with itself several challenges determining success of the outcome.

The first challenge is the assessment of their crimes committed during their time in Iraq and Syria. In order to bring FTF to justice within a legal framework, prosecutors need to have enough reliable evidence. However as highlighted by Mehra (2018), the collection of such evidence from the battlefield in Syria and Iraq, where the situation is still far from stable and secure, causes numerous challenges for the prosecutors. It is yet to be possible to travel to all war-torn areas within both countries to collect evidence. Moreover, there might not be a judicial cooperation agreement in place; or the legitimate government might not have sufficient effective control over the area where the evidence is located. Converting intelligence into admissible evidence itself is difficult, as courts have traditionally been averse to being presented with information without disclosure of its source and method of collection. (Furlan and Hoffman, 2020; Mehra, 2016)

Moreover, some non-standard evidence sources have emerged, as prosecutors have begun to use various data from social media and the internet in general. Communications exchanged through WhatsApp or Telegram, recordings, voice messages, photos and videos downloaded from Facebook or Instagram, screenshots from YouTube videos – all have been admitted and used as court evidence. Similar data have been used to demonstrate the intent of FTF that is difficult to disclose in the absence of sufficient evidence (especially when many defendants claim their intentions to be purely of humanitarian reasons). (Pokalova, 2020)

Some challenges have also been associated with a number of prosecutions that took place in absentia of FTF. While some jurisdictions do not allow such an option, countries such as Belgium, France, Italy or Netherlands have repeatedly launched investigations while foreign individuals were still remaining in Iraq or Syria. While this strategy enabled governments to assume a proactive stance, concerns regarding due process were raised as well. FTF have not always been notified about ongoing investigation or about being summoned to court. Consequently, they were denied an opportunity to prepare evidence serving as their defense. (Pokalova, 2020; RAN, 2017)

Finally, even cases of successful prosecution leading to imprisonment represent a great challenge. Being imprisoned constitutes a traumatic experience for a prisoner. According to Peter Neumann´s words, *"prisons are places of vulnerability which produce identity seekers, protection seekers and rebels in greater numbers than other environments"*. (Neumann, 2010) Difficult conditions in prisons often lead individuals to seek out like-minded individuals in hopes of finding protection and understanding. A religion often seems to offer an accessible way to cope with prison surroundings which is a well-known fact for already radicalized individuals as well as for recruiters. Extremists have mastered the art of exploiting conditions in prison to reach out to seeking individuals, later on proceeding to targeted indoctrination. As a result, numerous prisoners are plugged into networks extending far beyond the prison walls, further enhancing the challenge for government officials. (Hamm, 2007; Silke and Veldhuis, 2017)

4. Options for Dealing with IS FTF Currently Detained in Syria

Numerous fates of foreign terrorist fighters have been presented so far in this thesis, along with measures undertaken by governments of involved countries. The fate of those captured and still held by Kurdish authorities[26], particularly in northern Syria, remains uncertain. While the countries are unwilling to face and actively respond to the issue, security and humanitarian conditions in detention facilities and camps have significantly deteriorated over the past years.

4.1. Turkey Launches a Military Operation in Northern Syria

The issue of FTF remaining in Kurdish custodies has been brought to the attention of the international community following the Turkish military offensive in October 2019. With the intention of creating a *"buffer zone"* between the Turkey-Syria border and the area held by Kurdish autonomous administration, Turkish armed forces launched a military operation in Northern Syria. Such a move was especially encouraged by the withdrawal of US troops from the area. (Coolsaet and Renard, 2020)

Numerous governments have raised concerns regarding the Turkish offensive, as they were afraid that this situation will further destabilize the region and to some extent undermine the coalition´s efforts against the Islamic state. Furthermore, mostly European governments worried that the incursion would result in substantial jailbreak of thousands of IS (foreign) terrorist fighters held in the area by Kurdish authorities. (Mroue, 2019)

And although the operation lasted only 10 days until an agreement was reached, these fears were soon confirmed. On October 13, on the 4th day of the military offense, approximately 750 FTF[27] (mostly women with children) were allowed to leave from the Kurdish camp of *Ain Issa* amidst reported shelling of the camp and riots occurring against the guards. While the majority of those FTF remain unaccounted for, some women with children have managed to travel via Turkey back to their home countries. (McKernan, 2019)

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[26] Kurds have played a crucial role in fighting the Islamic State. Largely supported by the U.S led coalition operating primarily from an airspace, it was mainly Kurdish forces fighting on the battlefield, as IS has been expanding mainly on territories in Iraq and Syria held and inhabited by Kurds. As IS was gradually losing its power and control over its territory, Kurdish militants have detained numerous IS affiliates and placed them in provisional facilities or camps. But what seemed to be a temporary solution, resulted in a prolonged multidimensional challenge given the unwillingness of most countries to repatriate and prosecute their citizens.

[27] Among those 750 FTF, numerous Europeans have been found, namely, for instance, nationals of Ireland, France, Belgium, Sweden, Germany, or the UK. (Coolsaet and Renard, 2020)

In a response to the Turkish offensive, Kurdish forces had to redeploy part of their staff and guards away from securing camps and detention facilities. While insecurity was simultaneously rising in the camps and prisons as a result of internal revolts, Kurdish security had to prioritize the challenge that appeared with the arrival of Turkish armed forces. Moreover, IS pledges to free detainees had also increased the pressure resting on Kurdish shoulders. (AP, 2019) Since October 2019, a number of mutinies have taken place in Kurdish detention facilities. For instance, on March 29th of 2020, IS detainees managed to take over a part of the al-Sinaa prison, where approximately 5,000 IS male fighters are held, including foreigners. (Loveluck and Sly, 2020) Even more riots as well as various jailbreak attempts occurred in May, June and September of the same year. (Schmitt, 2020)

The increased instability in the region of northern Syria might pose a risk of FTF escaping and rejoining some fractions of the Islamic State, and subsequently they might become involved in further recruitment and attacks, not only in the Middle East, but also back in Europe and other western countries. However, even before the Turkish offensive, it was rather clear that Kurdish authorities did not have the capacity to design long-term arrangements for the thousands of IS affiliates they had captured. Rather, they were supposed to serve as a temporary solution. Yet countries involved in the matter delayed taking an action, as they were determined not to bring their nationals back but at the same time did not have any alternative proposal of a strategy that would deal with them.

4.2. Kurdish Camps for FTF in Northern Syria

FTF women and children are predominantly held in camps in northern Syria, from which the infamous Al-Hol and Roj camps are particularly distinguished given their FTF population living there. Currently, around 60,000 women and children live in these two places known for its deteriorating humanitarian and security conditions. Collectively, around 12,000 third-country nationals (not citizens of Iraq and Syria) In *Al-Hol camp´s Foreign Person´s Annex* alone; 2,038 foreign families made up of approximately 7,600 women and children of 58 different nationalities are placed. (Mehra et. al., 2022)

The *Al-Hol camp´s Foreign Person´s Annex* has been reported to be a place where security conditions have deteriorated most significantly. Cases of organized rebellion and violence among IS women and children have been noticed. Additionally, highly radicalized, extremist women trying to grab power and impose IS-style sharia law in the camp have been repeatedly dealt with. (ICG, 2020)

Moreover, a number of successful escapes have been reported. However, the complete list of FTF who have managed to escape is lacking, given the unclear (fuzzy) situation on the ground. Apart from several individual cases, neither Kurdish forces nor Western intelligence seems to have a complete full picture. (Coolsaet and Renard, 2020) Currently, as it was reported in August 2022, European FTF women and children no longer live in Al-Hol camp, as they have been transferred to Roj camp. As of May 2022, approximately 801 families and 2,506 individuals lived in the camp. (Mehra et.al, 2022; Reach, 2022)

4.2.1. Challenging environment in Northern Syrian Camps

Apart from (in)security conditions, the humanitarian situation too has been widely discussed with concern. The first challenge is posed by climate conditions, as cold winters and hot summers have persisted to take tool on the vulnerable population, struggling with poor sanitary conditions and malnutrition. Furthermore, the COVID19 pandemic has also worsened the situation. In this context, some children had died, including a few Europeans, yet exact numbers remain unknown. The conditions in the overcrowded and unsanitary refugee and detention camps are putting individuals (mostly children) in jeopardy and also risk strengthening the radicalization of older minors and adults, making the task of possible future reintegration into society much more difficult. (Dworkin, 2019)

Many states seem opting to leave their citizens where they are. Such a course increases not only the risk of human rights violations and radicalization, but it also overburdens local authorities in terms of their judicial and security capacities. And even in case of repatriation, women, children and other possibly vulnerable individuals might require a different approach and treatment upon their return, tailored to their specific circumstances. In numerous cases, legislative officials encounter a dilemma as to whether to even prosecute. Additionally, in reference to women, offences other than terrorism might have to be taken into consideration, for instance endangerment of children by bringing them to area of conflict. (Cook and Vale, 2018)

4.2.2. Women of the Caliphate

Women have played an important role within the Islamic State. And scholars as well as governments struggle with portraying them either as victims or co-perpetrators[28]. Although many have traveled to

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[28] In early years of the Islamic State, women were considered as "more impressionable and naive individuals" who often traveled to Iraq and Syria to find love and get married. Many others simply accompanied their husbands, having no other choice. Returning females were viewed as disillusioned and traumatized, therefore they were also approached with greater "empathy and understanding" than men. But among other factors, two particular incidents have hardened the overall attitude towards female FTF. In 2016, it was the discovery of a plot organized by group of French females to bomb the Notre-Dame cathedral in France. Two years later, another all-female cell was arrested for

Iraq and Syria to accompany their husbands, teenage girls and single women have also been lured into traveling for the prospect of establishment of the caliphate and marrying IS fighters portrayed as heroes. The principal role of women in the caliphate was rearing children and looking after their husbands - as described in the IS periodical magazine *Dabiq*, they were supposed to be *„wives of mujahids and mothers of lion cubs “.* (UNODC, 2021) According to IS ideology, a “good mother” *strives* to indoctrinate her children with core values of the ideology, raise future fighters and potential martyrs, and teach their daughters how to be a well-behaved future wife of IS fighters. (RAN, 2017)

Although active combat was not principally women´s role in the caliphate, some have received firearms training and were allowed to carry arms in public or were issued with suicide bomb vests. Alternatively, some women have joined the *al-Khansaa brigade*, the all-female religious police formed to deal with female IS affiliates accused of *„un-Islamic behavior”*. Members of this unit have been proven to be responsible for torturing prisoners and executing various physical punishment on those found guilty of breaching the strict IS code of conduct. (UNODC, 2021)

However, as Mehra (2016) underlines, the most critical roles women might have assumed are those of propagandists and radicalizers, utilizing their knowledge of social media and strategic online engagement. They served as a convincing tool, encouraging many, especially young girls and women, to migrate and facilitate their travel to Iraq and Syria. Female returnees have also been proven to seek to undertake or encourage attacks outside the caliphate. As reported, in the first half of 2017, approximately a quarter of all terrorist plots which have occurred Europe involved female suspects. Moreover, terrorist cells entirely comprised of women have been uncovered in Morocco, France or the United Kingdom.

4.2.3. The Lion Cubs: Troubling issue of IS children

Children who have accompanied their parents to Iraq and Syria or have been born to FTF within the caliphate territory, represent a specific challenging issue. As mentioned by RAN (2017), women in IS were encouraged to bear multiple children, as the contraception was also illegal under the rule of the Islamic State. Many of those born in Iraq or Syria have become stateless, as birth certificates issued by the Islamic State are invalid. Having been born to IS, children do not possess a passport or any other travel document, therefore they have no country to seek assistance from or to go back to. Other

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preparing a terrorist attack in the UK. IS women´s ideological commitment might vary from traumatized victims to committed radicals who indoctrinate their children and everyone they come into contact with; and distinguishing ones from the others represents a great challenge. (Khomami, 2018; Simcox, 2018) children have become orphans as their parents were killed, imprisoned or their whereabouts remain unknown. Moreover, the nationality of many others is to this day questionable, because without DNA testing there is no assurance of whom they have been born to. Finally, many children have been born to parents of two different nationalities, raising the issue of which one they could (and should) legally claim, as well as the question which country should take the responsibility for them. (Furlan and Hoffman, 2020)

Children have been indoctrinated with the caliphate's ideology, and later on have been trained to use weapons and thought to kill. They have been imbued to show absolute loyalty to the Islamic State and commitment to martyrdom as the highest cause. (Barrett, 2017) Once trained in weapons and explosives (coupled with religious instruction), children could perform support roles or act as spies, snipers and frontline combatants. The IS is considered as unique among terrorist groups especially in its audacious use of child soldiers, who have also been given significant roles in propaganda videos. Young FTF children have been filmed executing prisoners by detonating explosives, beheading them, or shooting others. The youngest known to date is a British boy of four, brought to Syria by his mother, who was shown in a propaganda video apparently detonating car explosives, and as a result, killing three captives. (Akbar, 2016)

Many children remained desensitized to violence and brutality, and severely traumatized. And as highlighted by UNSC (2021), psychological health and welfare of those who return to their (or their parents´) countries of origin must be the highest priority of any multi-agency approach, as they are likely to experience significant difficulties with integration into various communities. On the other hand, older children who might have been successfully radicalized and brainwashed represent a slightly different challenge. Those who have undergone military training, as part of which they have also been taught to kill, might be unpredictable and bring with themselves various security threats. Prosecutors and other government actors will face a challenge in approaching especially cases where the line between minors-victims and minors-perpetrators seems to be highly blurred, as any remnants of radicalization need to be countered to prevent security threats in years to come.

As reported in by the organization Save the Children (2021; 2022), 55 % of the camp Roj´s population is under the age of twelve. The total number of minors living in Roj and Al-Hol totals 40,000 which includes approximately 18,000 Iraqi children. Some third-country boys are also held in the Houri rehabilitation center or might be detained at other places in Northeast Syria about which less or no information is known. (Mehra et.al., 2022)

4.3. What Should Be Done? Exploring the Possibilities

Despite the urgency of the situation, only in very exceptional circumstances have governments proactively repatriated FTF directly from Syria. Almost exclusively, such repatriations concerned only unaccompanied children or children in significantly dire health conditions. Even though most governments recognize, and even emphasize the right of FTF children to return, they have been reluctant to take the step of repatriating the remaining more than 600 children detained in Syria, except for the exceptional cases mentioned above. (Coolsaet and Renard, 2018)

When it comes to adults, most governments remain hostile to the idea of repatriation. They see a great danger in bringing their citizens back home, as it would be a direct threat to their national security. Government officials believe that currently detained FTF are more like to be hardcore believers in the Islamic State´s ideology and purpose, in contrast to some previous returnees who might have left the theater as a result of disillusion. As defense secretary B. Wallace stated, *"they are the diehards. They are definitely in some cases dangerous".* (Courea and Swinford, 2019)

It is not only male FTF who are viewed this way. Women´s ideological commitment might vary from traumatized victims to committed radicals who will indoctrinate their children and those who they come into contact with. And although in early years of Islamic State women were approached with greater "empathy and understanding", two particular incidents have hardened the attitude toward female FTF. In 2016, it was discovery of a plot organized by a group of French females to bomb the Notre-Dame cathedral in France. Two years later, another all-female cell was arrested for preparing a terrorist attack in the UK. (Khomami, 2018; Simcox, 2018)

When it comes to political dimension, the biggest challenge governments face, when trying to formulate policies in response to the FTF phenomenon, is posed by general public opinion which oftentimes opposes the return of individuals involved with the Islamic State. As Furlan and Hoffman (2020) point out, in many western countries the public opinion inclines toward the *"closure of national borders to any external security threat (real or perceived) and assertive domestic policies".* A rationale behind such arguments might be the belief that FTF themselves have been the ones renouncing their citizenship, as videos of European terrorist fighters burning their passports upon arrival circulated in the online space mostly between 2014 and 2015. It was seen as evidence of voluntary abandonment of their citizenship for the sake of receiving IS Caliphate´s one. (Malik, 2014)

Fear of a public backlash is believed to, to a certain extent, lie behind governments´ hesitation on repatriating FTF and IS foreign supporters. According to one observer´s words, the controlled return of FTF to their countries of origin is *"a political matter more than anything"* because *"lawmakers will not dare to defy public opinion"*. (Cebrian, 2019) Some authors even call the decision of repatriation *"a political suicide"*. (Wille, 2019) And indeed, the issue seemed to trigger the fall of the Norwegian government or a political backlash against the pro-repatriation Foreign Minister of Finland. (Henley, 2020; Keuranen, 2020)

Instead of repatriation, most European countries have generally adopted the position that FTF should be prosecuted and dealt with *"where they have committed their offenses"*, thus implying either in Iraq or Syria. Some states touched upon the possibility of prosecuting detainees in the Kurdish region in Syria. But even before the Turkish offensive, feasibility of such an idea has been uncertain. The Syrian regime would have to consent to setting up an international tribunal. On the other hand, if the prosecution and further imprisonment took place under Kurdish authorities, it would require an enormous time-consuming investment in the local justice system as well as prison infrastructure. Proceeding with such a strategy without the approval of the Syrian regime would be politically controversial as well as would certainly provoke heavy Turkish opposition. (Dworkin, 2019)

For these reasons, the increasing attention has been focused on prosecution on Iraqi territory, either within the Iraqi justice system or through some form of international tribunal with multinational involvement. Although the right to fair trial is guaranteed by the Iraqi constitution and any acts of degrading treatment and torture are prohibited, the option of prosecuting FTF in Iraq raises numerous concerns. The criminal justice system in Iraq is believed to be weak and unable to provide necessary safeguards. In addition, cases of inhuman detention conditions, lack of fair trial or imposition of a death penalty have been reported and criticized. (Dworkin, 2019; Sendadi, 2020)

Another widely applied measure is a deprivation of nationality (revocation of citizenship that has been discussed in chapter 3.4.2.) Oftentimes the argument used by countries to deprive nationality is a threat to national security. (Baker, 2019; Boutine, 2016) Yet, as highlighted by Jenkins (2019), states should take under consideration whether the danger posed by repatriated FTF is higher than the one posed by "*a floating population of rootless jihadis"*. For national security threats to be legitimately justified as proportionate and necessary for certain restrictions, such threats should at least include a reasonable risk of serious disturbance. Not only an "*abstract, hypothetical or remote danger down the line"*. (Duffy, 2018)

4.3.1. (Un)predictable Turkish Behavior?

The 2019 Turkish military offensive to the northern region of Syria only highlighted the urgency of finding an immediate solution with regards to the detained FTF remaining in the area. Unsettled and insecure situation in this part of the world only provides a fertile land for further radicalization germination of terrorism, and therefore demonstrates a significant threat for global community. As a result of the 2019 offensive, security conditions and humanitarian situation considerably deteriorated. Many dangerous individuals fled and disappeared from the sight of security forces and their location remains unknown.

As stated by the Turkish president R. Erdogan, a new military offensive targeting Kurdish fighters in Syria remains on Turkey´s agenda, until all security concerns are addressed. And recent deadly bomb attack in Istanbul (November 13, 2022) has further prompted speculations whether Erdogan will carry through on his statement in the near future.

4. 4. Pressures to Repatriate Foreign Terrorist Fighters

To this time, most of the states, whose citizens decided to join the Islamic State and afterwards (when captured) expressed their desire to return, are unable (or rather unwilling) to find an adequate, coherent and consistent response to the problem they have been called to face. Several international actors have been pressuring countries around the world to repatriate their captured citizens mostly held in camps in northeastern Syria. Such attempts rest on the belief that fundamentally, FTF remain the responsibility of their home countries. (Furlan and Hoffman, 2020)

The United Nations has clearly expressed its position with regards to repatriation of detained FTF in Syria. In 2021, UN human rights experts vocalized serious solicitude over deteriorating security and humanitarian situation in northeast Syrian camps and urged 57 countries[29] whose citizens are believed to be held there, to proceed with active repatriation without further delay. *„The number of*

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[29] As of 2020, following countries had their nationals detained in Syria: Afghanistan, Albania, Algeria, Australia, Austria, Azerbaijan, Belgium, Bangladesh, Bosnia and Herzegovina, Canada, China, Denmark, Egypt, Estonia, Finland, France Georgia, Germany, Indonesia, India, Iran, Kazakhstan, Kyrgyzstan, Lebanon, Libya, Morocco, Maldives, North Macedonia, Malaysia, Netherlands, Norway, Pakistan, Philippines, Poland, Portugal, Romania, Russia, South Africa, Spain, State of Palestine, Saudi Arabia, Sudan, Senegal, Somalia, Serbia, Sweden, Switzerland, Tajikistan, Trinidad and Tobago, Tunisia, Turkey, Ukraine, United Kingdom, United States, Uzbekistan, Vietnam and Yemen. (OHCHR, 2021)

the countries concerned, and the dire humanitarian conditions of the camps highlight the need for collective, sustained and immediate action to prevent irreparable harm to the persons in vulnerable situation held there", the experts stated. The FTF held in the camps (mostly women and children) are exposed to exploitation, abuse, violence and in some cases even torture. An unknown number of individuals have already died as a result of their conditions of detention. Official letters were issued, addressing all 57 governments, recalling the urgent need for justice, truth and repatriation for all the FTF victims of serious violations of humanitarian law and human rights that have occurred in the region. In that context, continuous detention (on vague grounds) of FTF women and children in Syria is a matter of grave concern and *„undermines the progression of accountability, truth and justice".* (OHCHR, 2021)

The Organization of Security and Cooperation in Europe (OSCE) has been one of the strongest advocates calling for repatriation of FTF since the appearance of this phenomenon. The OSCE Office for Democratic Institutions and Human Rights (ODIHR) has published numerous guidelines highlighting the need of preserving human rights when it comes to FTF. Such guidelines are supposed to assist national authorities with addressing the challenges and threats of foreign IS individuals within a human rights framework. For instance, one of the ODIHR most complex publications presented in 2018 emphasizes the need to ensure that no one is made stateless and that especially women and children should be able to return to the *"country of their nationality or with which they have meaningful links, where they should then be provided with the protection and support indispensable for their reintegration and recovery".* (ODIHR, 2018)

In 2020, the ODIHR Director expressed even more urgency in his statement. *"Ignoring the dire circumstances of those who remain in camps of detention is not only a denial of their human rights, but also increases future security risks by providing fertile ground for later recruitment by terrorist or criminal organizations... I call for the urgent repatriation of all foreign citizens and in particular children, who need special protection".* Emphasized, at that time Director, I. S. Gísladóttir. (OSCE, 2020)

As an example of other initiatives towards repatriation, in 2019, several Council Members of the European Council of Foreign Relations (ECFR) issued an open letter which urged European governments to quickly facilitate a program of managed repatriation of their FTF held in Syria. Pointing out the security risks posed by ignoring the problem, authors of the letter argued that *"repatriation would ensure European control of ISIS members who might otherwise escape and* *become involved in new attacks"*, and also highlighted that *"children in the camps are at risk of becoming radicalized if they remain in lawless environment without treatment for their trauma or hope for the future"*. (ECFR, 2019)

Another open letter was published at the same time period by former senior British and American national security professionals. Noting that Western governments have refused to take any action regarding repatriation of their citizens, the experts warned that such approach will only create greater danger in the future and again called on states to repatriate all their nationals with a "*view to rehabilitation or prosecution as they deem appropriate and secure"*. (The Soufan Center, 2019)

Nevertheless, despite all these various urges to repatriate FTF, the question of how to deal with foreigners captured in Syria in the best way, remains for many Western governments highly problematic. Numerous countries have been trying to evade the issue and/or refused to respond to the call for repatriation. And according to Consigli (2018), it is worth emphasizing that challenges related to the return of FTF do not concern only one country. It is the whole international community that lacks effective strategy to bring to justice individuals who have associated themselves with the Islamic State; and might face possible consequences in the future.

Conclusion

The Islamic State has drawn to its ranks an unprecedented number of foreigners. And although the foreign fighter phenomenon has been present throughout the history, jihadis considerably diverged from other historical foreign fighter groups, as it was their zeal and persistence that motivated them to continuously engage in various insurgencies for the sake of *Ummah*. Similarly, the mobilization of foreign terrorist fighters to the so-called caliphate was an evolution of past jihadi movements that embodied some important thematic shifts.

In addition to mostly ideological space where previous Islamist terrorist groups have traditionally operated, the Islamic State anchored itself in a physical territory, creating (an attractive to many) opportunity of becoming not only fighters but above all citizens of the caliphate. In conjunction with the focus on governance which profoundly shifted the insurgent group´s funding sources and ability to expand, sophisticated enhancement of the recruitment strategies along with *"jihad through the media"* became among the main pillars of IS strategy. Demographically, FTF in Iraq and Syria represented a new generation of foreigners that, for the first time, included mobilization of women. The variety and sheer numbers of individuals successfully recruited by the IS indicated a fundamental change in the scope and nature of the conflict; and might, to some extent, provide an explanation for comprehensive challenges with regards to (potential) returnees that have later on appeared.

In 2014, as a response to the emerging phenomenon, the UN adopted the 2178 Resolution which stressed out the importance to comprehensively approach the FTF issue as well as provided Member States with guiding principles. The Resolution strived to impose on states legal obligations to adapt new provisions. Yet, not having any conceptual clarity of the threat and lacking clear definitions within the 2178 Resolution, governments decided to interpret such obligations in various ways.

Obligated to suppress the outflow of their citizens to Iraq and Syria, government authorities implemented several measures, from which three principal strategies aiming to reach the goal might be distinguished. In all cases, the goal remains the same: prevent (potential) FTF from leaving his state´s territory. Firstly, the ***soft preventive measures*** served as a primary tool to prevent individuals from being radicalized and becoming FTF in the first place. This result was supposed to be primarily achieved through community engagement and empowerment, collaboration with religious institutions or focusing on vulnerable groups. However, soft preventive measures alone proved to be insufficient, as despite various programs in use they were not able to effectively combat enhanced, successful recruitment; and in addition, cases of human rights abuse have also been reported. Secondly, numerous governments applied legislative measures focusing on ***prevention and restriction of travel***, striving to directly disrupt the physical ability of suspected individuals to leave their country of origin/residence. However, despite preventing immediate departures, the measure failed to address deeper aspects of radicalized and indoctrinated citizens who, being frustrated or desiring vengeance, might have become an even more serious security threat to their countries. Thirdly, countries aimed to discourage individuals from joining the IS theater through ***criminalization*** of the full range of conduct related to FTF. Mainly by presenting various consequences which individuals would face upon their return, governments hoped for suppressing the outflow of their citizens. Nevertheless, such measures hardly affected those who, after their successful departure, have never intended to return back home.

Responding to Returnees

Despite the efforts to prevent foreign citizens from traveling to Iraq and Syria, more than 40,000 individuals have left and therefore challenged governments to introduce measures addressing the (potential) FTF returnees. While seeking the way how to respond, various challenges arise, as there is no single, universal profile of such individuals. As mentioned by Barrett (2017), the progression from FTF to a potential domestic terrorist is not a linear one, nor is it inevitable, and significant amounts of returnees might never pose a threat for their countries of origin (relocation). But the difficulty remains how to distinguish those who will, those who might, those who might not and those who will not.

Several governments decided to avoid dealing with such a complex issue by targeting their citizens on the battlefield. ***Elimination*** of foreign combatants have become widely used yet not an official strategy to easily resolve the issue of their potential return. On the other hand, not many policies have brought so much controversy and criticism, especially from the human rights perspective. The circumstances surrounding eliminations were often heavily blurred and states oftentimes simply exploited the chaos of war to avoid adhering to the strict domestic demands of the rule of law. Such practice also promoted martyrdom, resulting in further radicalization and violence. The ***revocation of citizenship*** in the name of *"protecting national security"* proved to be another controversial measure, specifically due to often lacking transparency and concerns of arbitrariness. Its discriminatory nature has also been pointed out, as it tended to disproportionately affect nationals having immigrant backgrounds. Furthermore, leaving an individual stateless goes against the western legal principles as well as fundamental human rights, as every person has the right to nationality. It also forces the FTF to unwillingly relocate to a third country which poses its own risks and is merely relocating the issue. Similarly, a strategy of ***relocation*** of FTF to third party countries shared significant criticism of analogous nature.

In contrast to measures aimed to prevent FTF from coming back, various ***rehabilitation and reintegration*** programs have been put in use. Depending on particular goals of the program, it might strive to prevent (further) radicalization, promote disengagement, assist with effective reintegration into the society, or address the problem of psychological trauma and PTSD. However, such programs remain difficult to evaluate. Furthermore, rehabilitation and reintegration brings a lot of challenges, because assessing the level of risk posed by FTF returnees is both difficult, as potential motivations for outward travel and subsequent return are numerous, and resource intensive. Returnees are for many countries only one element of a much broader terrorist threat, each of which requires appropriate funding. (Byman and Shapiro, 2015)

The ***prosecution*** of FTF in their countries remains the principal responding measure to the FTF phenomenon, as it provides an individual with the right of fair and human trial and secures his protection from harmful and degrading behavior. Yet challenging aspects may also be found. Research has highlighted the difficulty of securing a criminal conviction relating to FTF activities in the conflict zone. Specific challenges in this area include the availability and gathering of evidence and the conversion of intelligence into admissible evidence. Moreover, even in cases of successful prosecution resulting in sentencing and following imprisonment the challenges are not over, as western prisons have proven to be an extremely fertile ground for further radicalization and targeted indoctrination.

Challenging Issue of Remaining FTF in Iraq and Syria

Foreign citizens remaining detained in Syria and Iraq represent a specific issue. It was the end of IS "physical caliphate" in the beginning of 2019, when the last territory under IS control was liberated, which marked an important turning point for IS affiliates. With numerous FTF ultimately being killed on the battlefield, captured, detained, deported to third party countries or dispersing to other locations, the fate of many still remains unsure. The issue how to approach the FTF remaining in Iraq and Syria became even more urgent following President Trump´s decision (October 2019) to withdraw all US forces remaining in the area, mainly in northeast Syria. This move enabled Turkey to gain more influence and power through its military operations in Syria, targeting mostly Kurds under whose supervision remaining FTF are held. These instances have already led to several prison-breaks as well as to deterioration of security and humanitarian conditions in the camps and detention centers.

The first possibility governments have in their disposal is to leave FTF where they are to be dealt with (prosecuted) by local authorities. The second option seems to be to actively prevent foreign IS affiliates from returning back home, either by using technical arguments to contest the existence of their initial nationality or by revocation of their citizenship. Another option for the countries to use, is to recognize the FTF´s right to return but avoid any operative efforts to facilitate their repatriation. Finally, a fourth option is to actively repatriate FTF and consequently subject them to prosecution in addition to monitoring, rehabilitation, or reintegration efforts following their return.

While numerous international organizations including the UN or OSCE along with various experts are calling on states to take a responsibility for their citizens and face the pressing issue, most governments are very hesitant toward this idea. However, while preventing the return of FTF might offer a short-term solution to the issue, it only delays the dangerous security consequences stemming from the problem. Foreign individuals without a country to return to demonstrate an easy target for international criminal networks. As was seen in the past, they can easily turn into a disenfranchised cohort of professional foreign combatants traveling from one armed insurgence to another. Without anywhere to go, they are well positioned to fall back on the familiarity of violent extremists or terrorist groups.

Lessons Learned and Further Possibilities for Research

Dealing with returning foreign terrorist fighters seem to be reviving a longstanding tension, especially in democratic countries, over how to balance civil liberties (human rights) and security in an age of transnational terrorism. The topic seems to remain on agenda for the upcoming years. And since FTF affiliated with the IS are considered a recent (only a decade old) issue, the topic along with responding policies shall be subject for further, and possibly much deeper and comprehensive research.

All the different types of returnees require various, specific, and tailored responses. Effective approach will therefore demand a more nuanced approach, which recognizes the complexity and diversity of returning and relocating FTF along with their families. And although finding the one obvious suitable solution to ensure long-term security seems unattainable, experience with previous waves of Islamist foreign fighters has demonstrated that inaction only exacerbates the threat. On the other hand, inadequate measures can push individuals toward further radicalization and violence instead of pulling them away from such a lifepath. A combination of measures such as repatriation, risk assessment, prosecution, rehabilitation, and further monitoring might offer venues for finding appropriate suitable approaches to various groups of FTF returnees.

Several questions regarding future of the foreign terrorist fighters affiliated with the Islamic State remain unanswered. There is a high probability of continuous production of jihadi FTF if paths leading to such a result are not interrupted. Simply responding to an already emerging threat appears to be insufficient, therefore addressing the root cause of such phenomenon is of significant value. Therefore, directing resources to encourage further qualitative research unrevealing motivations and discovering life trajectories and patterns that led to such an unprecedented outflow of foreigners into the Islamic State remains crucial.

Successful rehabilitation and reintegration programs aiming to result in healthy developmental trajectories remain a significant challenge, as insufficient amount of time has passed for lessons of best practice to be drawn. Detailed evaluation of such strategies might provide in the future a useful tool in tailoring the approach. Additionally, it might be useful to explore what strategic opportunities the FTF returnees could provide. (Jenkins, 2019) The security forces as well as legislative officials tend to primarily focus on individuals who might pose a security threat. And while an effective risk assessment remains important, could some of the FTF be turned into assets actively helping to discourage others from following their course? Given the numbers of early (most probably disillusioned) returnees, they could serve as an important advantage in strengthening the soft preventive measures for generations to come.

Furthermore, an action should be taken regarding foreign citizens remaining in Iraq and Syria. The territory once held by the IS has been liberated and as a consequence, numerous IS affiliates have been detained. But despite the territorial defeat of the Islamic State, its serious threat remains relevant. How could be FTF, who currently remain detained, utilized as a resource in the continuous worldwide struggle against the Islamic State and not just addressed (treated) solely as a burden or a threat?

Finally, the increasing activity of Turkish military forces, particularly in northern Syria, presents a considerable uncertainty for the future and further emphasizes the need of addressing the issue of the FTF detainees. War-destabilized and weekly governed areas have proven to be a breeding ground for radicalization and engagement in violent terrorist activities. Inactivity or further hesitation in repatriation of FTF might result in far-reaching consequences, shall Kurdish forces lose control over the overcrowded FTF camps and detention facilities.

References

ABI-HABIB, Maria; Tamer EL-GHOBASHY and Benoit FAUCON, 2017. *France´s Special Forces Hunt French Militants Fighting for Islamic State*. Wall Street Journal. May 29.

ABOULENEIN, Ahmed, 2017. *Less than 1,000 fighters remain in Iraq and Syria, coalition says*. Reuters. December 2017.

ACHARYA, Amitav, 2003. *Guns and butter: Why do human security and traditional security coexist in Asia?* Global Economic Review. Vol. 32, No. 3. January 2003.

AKBAR, Jay, 2016. *Shocking new ISIS video shows four-year-old British boy dubbed "Jihadi Junior" blowing up four alleged spies in a car bomb*. Daily Mail. February 10.

AL JAZEERA, 2022. *Turkey plans Syria operation as long as threat remains: Erdogan*. Al Jazeera. July 20.

ALKIRE, Sabina, 2003. *A Conceptual Framework of Human Security*. Centre for Research on Inequality, Human Security and Ethnicity (CRISE). Working Paper No. 2.

ANWAR, Dewi Fortuna, 2003. *Human Security: An Intractable Problem in Asia*. In *Asian Security Order* (Ed. ALAGAPPA, Muthiah). Stanford University Press.

ARASLI, Jahangir E., 2015. *Jihadist Foreign Fighters from A to Z: 200 Essential Facts You Need to Know about Expeditionary Warfare in the Middle East*. Archipelago SYRAQ. Baku: Teknur.

ASSOCIATED PRESS (AP), 2019. *ISIS leader purportedly urges members to free detainees from camps.* The Associated Press in Beirut. Guardian. September 16.

BAKER, Timnah, 2019. *Deprivation of nationality on national security grounds in Australia: Part of a wider threat*. Statelessness.eu. April 11.

BAKER, Edwin and Mark SINGLETON, 2016. *Foreign Fighters in the Syria and Iraq Conflict: Statistics and Characteristics of a Rapidly Growing Phenomenon*. Chapter 2 in *Foreign Fighters under International Law and Beyond*. T.M.C. Asser Press. Netherlands: Hague.

BALDWIN, David A., 1993. *Neorealism and Neoliberalism*. Columbia University Press. New York.

BARRETT, Richard, 2017. *Beyond the Caliphate: Foreign Fighters and the Threat of Returnees*. The Soufan Center. New York. October.

BARRETT, Richard; Robert MCFADDEN; Patrick M. SKINNER and Lila GHOSH, 2017. *Foreign Fighters in Syria*. The Soufan Center. New York.

BASIT, Abdul, 2014. *Foreign Fighters in Syria – Why So Many?* International Centre for Political Violence and Terrorism Research. Counter Terrorist Trends and Analyses. Vol. 6, No. 9.

BASRA, Rajan; Claudia BRUNNER and Peter R. NEUMANN, 2016. *Terrorist Futures: European Jihadists and the New Crime-Terror Nexus*. The International Centre for the Study of Radicalization and Political Violence (ISCR).

BAUER, Kathrine, 2016. *Beyond Syria and Iraq – Examining Islamic State Provinces*. The Washington Institute for Near East Policy.

BBC, 2016. *Jihadi John´s Death: Islamic State Says Mohammed Emwazi killed.* BBC News. January 19.

BBC, 2017. *British IS Recruiter Sally-Anne Jones "Killed by Drone"*. BBC News. October 12.

BBC, 2019. *Shamima Begum: IS teenager´s baby son has died, SDF confirms*. BBC News. March 08.

BERGER, J. M. and Jessica STERN, 2015 . *Why are Foreign Fighters Joining ISIS?* Defense One. March 8.

BIXLER, Mark; Michael HOGENMILLER; Tim LISTER; Sean O´KEY; Ray SANCHEZ and Mohammed TAWFEEQ, 2018. *ISIS goes global: 134 attacks in 29 countries have killed 2,043*. CNN. February 12.

BLAKER, Lisa, 2016. *The Islamic State´s Use of Online Social Media*. Military Cyber Affairs. Vol. 1, Issue 1, Article 4.

BORYS, Stephanie and Louise YAXLEY, 2018. *Islamic State Involvement Sees Five Australian Terrorists Stripped of Citizenship.* ABC News. August 09.

BOUTIN, Bérénice, 2016. *Administrative Measures against Foreign Fighters: In Search for Limits and Safeguards*. International Centre for Counter-Terrorism (ICCT). Netherlands: Hague.

BOUTIN, Bérénice; Grégory CHAUZAL; Jessica DORSEY; Marjolejn JEGERINGS; Christophe PAULUSSEN; Johanna POHL, Alastair REED and Sofia ZAVAGLI, 2016. *The Foreign Fighters Phenomenon in the European Union. Profiles, Threats and Policies*. International Centre for Counter-Terrorism (ICCT). ICCT Research Paper. Netherlands: Hague.

BUNZEL, Cole, 2015. *From Paper State to Caliphate: The Ideology of the Islamic State*. The Brookings Institution. Analysis Paper No. 19.

BUZAN, Barry, 1991. *People, States and Fear: An Agenda for International Security Studies in the Post-Cold War Era*. Harvester Wheatsheaf.

BURTON, Melanie and Tom WESTBROOK, 2018. *Melbourne police see Islamic State inspiration behind stabbings.* Reuters. November 9.

BYMAN, Daniel, 2016. *What´s beyond the defeat of ISIS?* Brookings Institution. September 27.

BYMAN, Daniel, 2019. *Road Warriors: Foreign Fighters in the Armies of Jihad*. Oxford University Press. New York.

BYMAN, Daniel and Jeremy SHAPIRO, 2014. *Be Afraid. Be a Little Afraid: The Threat of Terrorism from Foreign Fighters in Syria and Iraq*. The Brookings Institution. Policy Paper No. 34.

CABALLERO, Anthony M., 2016. *Introduction to the Non-Traditional Security Studies: A Transnational Approach*. Sage Publications. London.

CEBRIAN, Pilar, 2019. *They Left to Join ISIS. Now Europe Is Leaving Their Citizens to Die in Iraq.* Foreign Policy. September 15.

CHAPPELL, Bill, 2017. *Red Cross Urges Fair and Lawful Treatment of Captured ISIS Fighters*. NPR. October 26.

CHENOY, Anuradha and Shahrbanou TADJBAKHSH, 2007. *Human Security: Concepts and Implications*. Routledge. London.

COCKBURN, Patrick, 2009. *Torture? It probably killed more Americans than 9/11*. The Independent. April 26.

COOLSAET, Rik and Thomas RENARD, 2020. *From bad to worse: The fate of European foreign fighters and families detained in Syria, one year after the Turkish offensive*. Egmont Institute. Security Policy Brief. No. 130.

CONSIGLI, Jenna, 2018. *Prosecuting the Islamic State Fighters Left Behind*. Lawfare. August 01.

COOK Joanna and Gina VALE, 2018. *From Daesh to "Diaspora": Tracing Women and Minors of Islamic State*. International Centre for the Study of Radicalization. King´s College. London.

COUREA, Eleni and Steven SWINFORD, 2019. *Diehard ISIS prisoners must stay in Syria, says defense secretary Ben Wallace*. The Times. October 02.

COUSSERAN, Jean-Claude and Agnes LEVALLOIS, 2017. *The financing of the Islamic State in Iraq and Syria (ISIS)*. Directorate-General for External Policies, Policy Department. European Parliament.

CUNNINGHAM, Melissa, 2018. *The Case for and Against Cancelling Terror Suspects´ Passports*. Age. November 21.

CRAGIN, Kim, 2017. *Foreign Fighter "Hot Potato".* Lawfare. November 26.

CTED, 2018. *The challenge of returning and relocating foreign terrorist fighters: research perspectives*. UNSC Counter-Terrorism Committee Executive Directorate (CTED). CTED Trends Report.

DAVIES, Gareth, 2019. *ISIL Beatles: Government Right Not to Block Death Penalty, High Court Rules*. Telegraph. January 18.

DODD, Vikram and Kevin RAWLINSON, 2019. *Shamima Begum: ISIS Briton faces move to revoke citizenship*. The Guardian. February 19.

DONELLY, Maria Galperin; Thomas M. SANDERSON and Zack FELLMAN, 2017. *Foreign Fighters in History*. Center for Strategic and International Studies (CSIS). Washington DC.

DUFFY, Helen, 2018. *Foreign terrorist fighters: A human rights approach?* Brill Nijhoff. December 12.

DWORKIN, Anthony, 2019. *Beyond good and evil: Why Europe should bring ISIS foreign fighters home.* European Council on Foreign Relations (ecfr.eu). Policy Brief. October 25.

ECFR, 2019. *Open letter: Call foe a managed return of ISIS foreign fighters*. European Council on Foreign Relations (ECFR). November 26.

ECTC, 2016. *Enhancing Europol´s Counter Terrorism Capabilities*. European Counter Terrorism Centre (ECTC) at Europol. Council of the European Union, Doc. 8881/16. May 13.

ELMAN, Colin, 2008. *Realism*. Part 1, Chapter 2 in *Security Studies: An Introduction*. Routledge. New York.

EUROJUST, 2020. *Cumulative Prosecution of Foreign Terrorist Fighters for Core International Crimes and Terrorism-Related Offences*. Eurojust. Netherlands: Hague.

EUROPOL, 2015. *Increased Law Enforcement Cooperation Between the United States and Europe*. Europol. February 25.

EWAN, Pauline, 2007. *Deepening the Human Security Debate: Beyond the Politics of Conceptual Clarification*. Politics. Vol. 27, No. 3.

FISHMAN, Brian, 2013. *Syria Proving More Fertile than Iraq to Al-Qaida´s Operations*. CTC Sentinel. November 26.

FLORES, Marcello, 2016. *Foreign Fighters Involvement in National and International Wars: A Historical Survey*. Chapter 3 in *Foreign Fighters under International Law and Beyond*. T.M.C. Asser Press. Netherlands: Hague.

FLORINI, Ann M., 2000. *The Third Force: The Rise of Transnational Society*. The Carnegie Endowment for International Peace. Washington DC.

FRANCESCHET, Antonio, 2006. *Global Legalism and Human Security*. In: *A Decade of Human Security: Global Governance and New Multilateralism* (MACLEAN, Sandra; David Ross BLACK and Timothy M. SHAW). Routledge.

FURLAN, Marta and Adam HOFFMAN, 2020. *Challenges Posed by Returning Foreign Fighters*. GW Program on Extremism. The George Washington University.

GALL, Carlotta, 2014. *The Wrong Enemy: America in Afghanistan, 2001-2014*. Houghton Mifflin Harcourt. Boston, MA.

GENEVA ACADEMY OF INTERNATIONAL HUMANITARIAN LAW AND HUMAN RIGHTS, 2014. *Academy Briefing No. 7: Foreign Fighters Under International Law*. Geneva Academy of International Humanitarian Law and Human Rights.

GEORGES, Fawas A., 2005. *The Far Enemy: How Jihad Went Global*. Cambridge University Press, United States of America.

GCTF, 2014. *The Hague-Marrakech Memorandum on Good Practices for a More Effective Response to the FTF Phenomenon.* Global Counterterrorism Forum (GCTF). September 23.

GCTF, 2015. *Addendum to The Hague-Marrakech Memorandum on Good Practices for a More Effective Response to the FTF Phenomenon, with a focus of Returning FTFs*. Global Counterterrorism Forum (GCTF). September 27.

GLOBAL LEGAL MONITOR, 2015. *France: Six French Citizens Prohibited from Leaving under New Anti-Terrorism Law*. Library of Congress. February 26.

GLOBERMAN, Jordana, 2015. *Ottawa Moves to Revoke Citizenship of Convicted Terrorist for First Time Since Controversial Law Took Effect.* National Post. July 01.

GOULD, Skye and Michal KRANZ, 2017. *These maps show how drastically ISIS territory has shrunk since its peak*. Insider. October 24.

GUARDIAN, 2017. *UK Has Stripped 150 Jihadists and Criminals of Citizenship*. Guardian. July 30.

HAFEZ, Mohammed M., 2007. *Suicide Bombers in Iraq: The Strategy and Ideology of Martyrdom*. The United States Institute of Peace. Washington, DC.

HAMILTON, Fiona and Richard FORD, 2018. *Hate Preacher Anjem Choudary Must Go on AntiExtremism Course*. Times. October 29.

HAMM, Mark S., 2007. *Terrorist Recruitment in American Correctional Institutions: An Exploratory Study of Non-traditional Faith Groups Final Report*. US Department of Justice. Commissioned Report.

HEGGHAMMER, Thomas, 2010. *The Rise of Muslim Foreign Fighters*. International Security, vol. 35, no. 3. MIT Press.

HENLEY, Jon, 2020. *Norway populist party quits coalition over "ISIS bride" repatriation*. Guardian. January 20.

HIGGINS, Andrew, 2014. *For Jihadists, Denmark Tries Rehabilitation.* New York Times. December 14.

HOLLAND, Joshua, 2014. *Why Have a Record Number of Westerners Joined the Islamic State?* BillMoyers.com. October 10.

HOLMER, Georgia and Adrian SHTUNI, 2017. *Returning Foreign Fighters and the Reintegration Imperative*. United States Institute of Peace (USIP).

HORGAN, John and Max TAYLOR, 2012. *Disengagement, De-radicalization and the Arc of Terrorism: Future Directions for Research*. In *Jihadi Terrorism and the Radicalization Challenge* (COOLSAET, Rik). Routledge. Oxford.

HROMADSKE INTERNATIONAL, 2017. *How Former "Islamic State" Militants Wind up in Ukraine*. Hromadske International. August 08.

HUMUD, Carla E.; Robert PIROG and Liana ROSEN, 2015. *Islamic State Financing and U.S. Policy Approaches*. Congressional Research Service (CRS Report).

HUGGLER, Justin, 2016. *Dual Nationals who Fight for Terror Groups to be Stripped of German Citizenship*. The Telegraph. August 11.

ICG, 2020. *European Challenges in Confronting the Fate of ISIS Returnees.* International Crisis Group (ICG). January 29.

INTERPOL, 2016. *INTERPOL Chief warns of dangerous gaps in global screening of foreign terrorist fighters*. INTERPOL. October 21.

JENKINS, Brian Michael, 2019. *Options for dealing with Islamic State Foreign Fighters currently detained in Syria*. Combating Terrorism Center. CTC Sentinel. Vol. 12, No. 5.

JOLLY, Richard and D.B. RAY, 2006. *National Human Development Reports and the Human Security Framework: A review of Analysis and Experience*. Human Development Report Office.

KALDOR, Mary, 2007. *Human Security: Reflections on Globalization and Intervention*. Polity Press. Cambridge.

KATZ, Rita, 2014. *The State Department´s Twitter War with ISIS is Embarrassing*. Time. September 16.

KAURANEN, Anne, 2020. *Finland´s foreign minister faces probe over Syria repatriations*. Reuters. February 19.

KHOMAMI, Nadia, 2018. *How London teenager plotted attacks with all-female terror cell.* Guardian. June 04.

KOHLMANN, Evan F., 2004. *Al-Qaida´s Jihad in Europe: The Afghan-Bosnian Network*. New York. New York, Berg.

KOSEOGLU, Sinem, 2022. *Analysis: Is Turkey set for new military operation in Syria?* Al Jazeera. November 18.

LAHNAIT, Fatima, 2021. *Combatting radicalization in France: from experimentation to professionalization*. Revista CIDOB d'Afers Internacionals, Vol. 128.

LAMOTHE, Dan and Missy RYAN, 2019. *Trump says Islamic State leader Abu Bakr al-Baghdadi blew himself up as U.S. troops closed in.* The Washington Post. October 27.

LODGAARD, Sverre, 2000. *Human security: concept and operationalization*. Norwegian Institute of International Affairs.

LOVELUCK, Louisa and Liz SLY, 2020. *Kurdish-led forces put down revolt by ISIS detainees at prison in Syria*. The Washington Post. March 30.

MALET, David, 2010. *Why Foreign Fighters? Historical Perspectives and Solutions*. Orbis 54, no.1. Spring 2010.

MALET, David, 2013. *Foreign Fighters: Transnational Identities in Foreign Conflicts*. Oxford: University Press.

MALET, David, 2015. *Foreign Fighter Mobilization and Persistence in a Global Context*. Terrorism and Political Violence. May 05.

MALIK, Shiv, 2014. *French ISIS Fighters Filmed Burning Passports and Calling for Terror at Home*. Guardian. November 19.

MANEVICH, Dorothy and Jacob POUSHTER, 2017. *Globally, People Point to ISIS and Climate Change as Leading Security Threats*. Pew Research Center. August 01.

MCKERNAN, Bethan, 2019. *At least 750 ISIS affiliates escape Syria camp after Turkish shelling*. Guardian. October 13.

MCVEIGH, Tracy, 2014. *"Police Betrayed Me" Says Mother of Imprisoned British Jihadi*. Guardian. December 06.

MEHRA, Tanya, 2018. *Bringing (Foreign) Terrorist Fighters to Justice in a Post-ISIS Landscape Part III: Collecting Evidence from Conflict Situations*. The International Centre for Counter-Terrorism (ICCT). Hague. June 12.

MEHRA, Tanya; Matthew WENTWORTH and Abigail THORLEY, 2022. *The European Court of Human Rights Sitting on the Fence? Its Ruling and Impact on the Repatriation of European Children from North-East Syria*. International Centre for Counter-Terrorism (ICCT). September 22.

MEKHENNET, Souad and Greg MILLER, 2016. *An ISIS Defector or Willing Party?* Washington Post. October 05.

MENDELSOHN, Barak, 2011. *Foreign Fighters – Recent Trends*. Orbis 55, no. 2.

MENON, Venu, 2007. *Human Security: Concept and Practice*. MPRA Papers, No. 2478. University Library of Munich.

MERRICK, Rob, 2017. *Gavin Williamson Labelled "Juvenile" for Saying All British ISIS Fighters Should be Hunted and Killed*. Independent. December 07.

MILLER, John, 2016. *Switzerland Wants to Strip Citizenship from Jihadist Suspects*. Reuters. May 10.

MONTAY, Johanne, 2015. *Déchéance de Nationalité: en Belgique, Votée sans Tragédie Mais Limitée*. Radio Télévision Belge Francophone. December 29.

MOORE, Jack, 2017. *End of ISIS Approaching as Caliphate Loses Money and Land*. Newsweek. June 29.

MROUE, Bassem, 2019. *Turkish invasion raises fears of Islamic State prison break*. AP. October 11.

MULLINS, Sam, 2014. *Foreign Fighters in Syria: Tracking the Trends and Assessing the Threat*. Per Concordiam 5 No. 3.

NEUMANN, Peter R., 2010. *Prisons and Terrorism: Radicalization and De-radicalization in 15 Countries*. International Centre for the Study of Radicalization and Political Violence (ICSR). London.

ODIHR, 2018. *Guidelines for Addressing the Threats and Challenges of Foreign Terrorist Fighters within a Human Rights Framework*. OSCE Office for Democratic Institutions and Human Rights (ODIHR). Organization for Security and Cooperation in Europe (OSCE). September 12.

OHCHR, 2021. *Syria: UN experts urge 57 States to repatriate women and children from squalid camps*. Office of the United Nations High Commissioner for Human Rights (OHCHR). United Nations. February 08.

OLIDORT, Jacob, 2016. *Inside the Caliphate´s Classroom: Textbooks, Guidance Literature and Indoctrination Methods of the Islamic State*. Policy Focus, Vol. 147.

OSCE, 2020. *Repatriation of "foreign terrorist fighters" and their families urgently needed to safeguard human rights and security, OSCE human rights head says*. Organization for Security and Cooperation in Europe (OSCE). February 11.

PARIS, Roland, 2001. *Human Security, Paradigm Shift or Hot Air*. International Security. Vol. 26, No. 2.

PAZ, Reuven, 2005. *Arab Volunteers Killed in Iraq: An Analysis*. PRISM Occasional Papers 3, no.1.

PEOPLES, Columba and Nick Vaughan-WILLIAMS, 2015. *Critical Security Studies: An Introduction*. Taylor & Francis Group. London.

PIETERS, Janene, 2017. *Government Revokes Dutch Nationality of First Convicted Jihadist*. Netherland Times. August 23.

POKALOVA, Elena, 2020. *Returning Islamist Foreign Fighters, Threats and Challenges to the West*. Palgrave Macmillan.

POWELL, Robert, 1994. *Anarchy in international relations theory: the neorealist-neoliberal debate*. International Organization.

RAN, 2017. *Responses to returnees: Foreign terrorist fighters and their families*. Radicalization Awareness Network (RAN).

RAN, 2018. *Preventing Radicalization to Terrorism and Violent Extremism: Community Engagement and Empowerment*. Radicalization Awareness Network (RAN).

REACH, 2022. *Camp Profile: Roj*. Reach. May 2022.

RENARD, Thomas; Rik COOLSAET; Daniel H. HEINKE; David MALET; Simon MINKS; Jan RAUDSZUS and Bibi van GINKEL, 2018. *Returnees: Who are They, Why are They (Not) Coming Back and How Should We Deal with Them? Assessing Policies on Returning Foreign Terrorist Fighters in Belgium, Germany and the Netherlands.* Egmont. Egmont Paper 101.

REUTERS, 2016. *Islamic State calls for attacks on the West during Ramadan in audio message*. Reuters. May 21.

REUTERS, 2017. *Malaysia Protests Over Suspected Militants Deported from Turkey Ahead of Southeast Asian Games*. Reuters. August 08.

RFERL, 2016. *U.S. Envoy Says Number of Islamic State Foreign Fighters Dropping*. Radio Free Europe/Radio Liberty. February 23.

ROGGIO, Bill, 2014. *ISIS Announces Formation of Caliphate, Rebrands as "Islamic State".* Long War Journal. June 29.

RUBIN Barry and Judith Culp RUBIN, 2002. *Anti-American Terrorism and the Middle East*. Oxford University Press. Oxford, England.

RUDOLPH, Christopher, 2003. *Globalization and Security*. Security Studies Vol. 13, No. 1.

SAFI, Michael, 2016. *ISIS Members can now be Stripped of Australian Citizenship*. The Guardian. May 05.

SAID, Rodi, 2019. *Islamic State "caliphate" defeated, yet threat persists*. Reuters. March 23.

SAVE THE CHILDREN, 2021. *When am I going to start to live?* Save the Children. September 27.

SAVE THE CHILDREN, 2022. *Speed up repatriations or foreign children could be stuck in northeast Syria camps for up to 30 years, warns Save the Children*. Save the Children. March 23.

SCHMITT, Eric, 2020. *ISIS Prisoners Threaten US Mission in Northeastern Syria.* The New York Times. May 25.

SEE, Sylvene, 2018. *Returning Foreign Terrorist Fighters: A Catalyst for Recidivism Among Disengaged Terrorists*. Counter Terrorist Trends and Analyses, Vol. 10, No. 6. International Centre for Political Violence and Terrorism Research.

SENDADI, Majdoulin, 2020. *Unfair trials and the death penalty for terrorism in Iraq*. World Coalition. January 13.

SENGUPTA, Somini, 2014. *Nations Trying to Stop Their Citizens from Going to Middle East to Fight for ISIS*. The New York Times. September 14.

SHIMKO, Keith L., 1992. *Realism, Neorealism, and American Liberalism*. The Review of Politics. Vol. 54, No. 2. Spring.

SHINODA, Hideaki, 2004. *Conflict and Human Security: A search for new approaches of Peace-Building*. IPSHU Research Report Series, No. 19. Hiroshima University.

SILKE, Andrew and Tinka VELDHUIS, 2017. *Countering Violent Extremism in Prisons: A Review of Key Recent Research and Critical Research Gaps.* Perspectives on Terrorism. Vol. 11, No.5.

SIMCOX, Robin, 2018. *The 2016 French Female Attack Cell: A Case Study*. Combatting Terrorism Centre (CTC). CTC Sentinel. Vol.11, No.6

SNYDER, Glenn H., 1984. *The Security Dilemma in Alliance Politics*. World Politics. Vol. 36, No. 4.

STARR, Barbara, 2015. *Official: U.S. Keeping ISIS Kill List*. CNN. February 18.

TERRILL, Andrew W., 2008. *Regional Spillover Effects of the Iraq War*. US Army War College. USAWC Press.

THE LOCAL, 2014. *Terrorists May Lose Norwegian Citizenship*. The Local. August 25.

THE LOCAL, 2017. *Wanted Dead, Not Alive: France´s Approach to French Jihadists*. Local. October 18.

THE LOCAL, 2016. *Supreme Court Strips Terrorist of Danish Citizenship*. The Local. June 08.

THE SOUFAN CENTER, 2019. *Open Letter from National Security Professionals to Western Governments: Unless We Act Now, the Islamic State Will Rise Again*. The Soufan Center. September 11.

THE US DEPARTMENT OF JUSTICE, 2016. *California Man Sentenced to 12 Years in Prison for Attempting to Join ISIL.* The United Department of Justice. The Office of Public Affairs. June 07.

THOMAS, Nicholas and William T. TOW, 2002. *The Utility of Human Security: Sovereignty and Human Intervention*. Security Dialogue. Vol. 33, No. 2.

THOMSON, Janice, 1994. *Mercenaries, Pirates and Sovereigns: State-Building and Extraterritorial Violence in Early Modern Europe.* Princeton University Press. Princeton.

TRAVIS, Alan, 2017. *UK Can Strip Terror Suspects of Citizenship, European Judges Rule*. The Guardian. March 09.

UK PARLIAMENT, 2015. *Counter-terrorism: foreign fighters*. UK Parliament, House of Commons. March 26.

UN, 1948. *Universal Declaration of Human Rights*. United Nations (UN).

UN, 2014. *Security Council Unanimously Adopts Resolution Condemning Violent Extremism Underscoring Need to Prevent Travel, Support for Foreign Terrorist Fighters*. Security Council SC/11580. United Nations (UN), September 14.

UNCT, 2017. *Enhancing the Understanding of Foreign Terrorist Fighters Phenomenon in Syria.* United Nations Office for Counter-Terrorism.

UNDP, 1994. *Human Development Report: New Dimensions of Human Security*. United Nations Development Program (UNDP). New York.

UNSC, 2014. *Security Council Unanimously Adopts Resolution Condemning Violent Extremism, Underscoring Need to Prevent Travel, Support for Foreign Terrorist Fighters*. United Nations Security Council (UNSC). September 24.

UNSC, 2015. *Madrid Guiding Principles*. United Nations Security Council (UNSC). Counter-Terrorism Committee. December 23.

UNSC, 2017. *Resolution 2396 (S/RES/2396(2017)).* United Nations Security Council (UNSC). December 21.

UNSC, 2018. *Addendum to the Madrid Guiding Principles*. United Nations Security Council (UNSC). Counter-Terrorism Committee. December 28.

UNSG, 2015. *Secretary-General´s remarks to Security Council meeting on Threats to International Peace and Security Caused by Terrorist Acts (Foreign Terrorist Fighters).* United Nations Secretary-General (UNSG). United Nations. May 29.

UNODC, 2019. *Foreign Terrorist Fighters: Manual for Judicial Training Institutes, South-Eastern Europe*. United Nations Office on Drugs and Crime (UNODC), United Nations. Vienna.

UNODC, 2021. *Foreign Terrorist Fighters: Manual for Judicial Training Institutes, Middle East and North Africa*. United Nations Office on Drugs and Crime (UNODC). United Nations. Vienna.

UNOSAA, 2007. *Combatants on Foreign Soil*. United Nations Office for the Special Advisor on Africa (UNOSAA). Issue Paper. DRC: Kinshasa.

VIDINO, Lorenzo, 2014. *European Foreign Fighters in Syria: Dynamics and Responses*. European View. Vol.13, No. 1. December 01.

WALTZ, Kenneth, 1979. *Theory of International Politics*. McGraw-Hill. New York.

WILLE, Belkis, 2019. *ISIS Suspect Transfers to Iraq Replete with Risks*. Human Rights Watch. November 01.

WINTER, Chase, 2019. *As IS Crumbles, Syrian Kurds Want Germany to Take Back Foreign Fighters.* DW. February 04.

WRIGHT, Robin, 2017. *Are We Nearing the Endgame with ISIS?* The New Yorker. July 27.

ZELIN, Aaron Y., 2012. *Foreign Fighters Trickle into the Syrian Rebellion*. Washington Institute for Near East Policy. June 11.

ZELIN, Aaron Y., 2013. *Up to 11,000 Foreign Fighters in Syria; Steep Rise Among Western Europeans*. Washington Institute for Near East Policy. December 17.