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Introduction

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The involvement of women in terrorism is not new, but it has gained more attention with the rise of the Islamic State in Iraq and Syria (ISIS), which attracted many women to its so-called caliphate. Initially perceived as victims or harmless, these women progressively became a growing subject of attention and concern for security services. In 2017, the Dutch intelligence service (AIVD) already indicated that the threat emanating from female jihadis should not be underestimated, while recognising knowledge gaps about the role(s) these women played in jihadi movements or the threat they posed. ¹ The same year, the United Nations Security Council Resolution 2396 (2017) stressed that women who were affiliated with terrorist organisations "may have served in many different roles, including as supporters, facilitators, or perpetrators of terrorist acts" and urged states to pay special attention to this as women "require special focus when developing tailored prosecution, rehabilitation and reintegration strategies." Yet, in spite of more attention from counter-terrorism services, and a growing body of literature on female terrorists, there is still a considerable lack of data-driven, empirical research on female violent extremist offenders (VEOs). This book seeks to inform practitioners and policy-makers on how to manage female VEOs through the criminal justice system in a rule of law and human rights compliant manner through four case studies in Europe.

Context

It is estimated that around 20 percent (around 1,000 individuals) of the so-called 'foreign terrorist fighters' (FTFs) who joined ISIS from Europe were women.³ Through the promotion of a utopian society, and through specific propaganda, ISIS successfully appealed to women and even to entire families, promoting a sort of 'family-friendly' jihad.

The media often described women who travelled to join a terrorist organisation abroad as naive lovers lured to the caliphate through romantic scams, and often labelled as "jihadi brides". However, it has been well documented that many European women joined ISIS for a much wider range of reasons, such as belief in the ideology, seeking a sense of belonging, a higher cause, adventure, or an alternative life path. In short, women were motivated by a broad range of push and pull factors, just like men. Once in ISIS territory, women performed a variety of roles. Although most women were confined to their household with the mission to give birth to, and raise children to grow the so-called caliphate, some women played more active roles in ISIS bureaucracy, such as working as nurses, prison guards, or religious police officers. Furthermore, some women actively contributed to ISIS propaganda, fundraising, and recruitment activities.⁴

After the fall of the so-called caliphate in March 2019, following the last battle in Baghuz, thousands of alleged ISIS members – both men and women – were captured and detained by Kurdish-led forces, mainly in Northeast Syria. Several hundred European adults were among them, a majority of them women, as well as hundreds of children.⁵ This situation presented European governments with a dilemma – would they repatriate these individuals to their home countries or not? After a strong initial reluctance, some European governments started to repatriate children, first, and then some women - mostly mothers with their children. Several governments have been challenged in front of national courts but also at the European Court of Human Rights (ECtHR) in order to demand the repatriation of European citizens. ⁶ Between 2019 and late 2023, at least 400 children and 136 women were repatriated by various European governments, although more European women and children remain in the area. 7 In contrast, only a handful of men have been repatriated thus far. Repatriations were therefore at least partly gender-biased, an approach that was supported by many NGOs.8 The repatriation of women was facilitated by their status as mothers, and the fact they were detained alongside their children, as opposed to men, while men were perceived as more dangerous to repatriate, both from a security point of view as well as from a political point of view.

Not all radicalised women travelled to Syria and Iraq or attempted to do so. Several VEOs remained in Europe and attracted the attention of security services as they were involved in various activities such as financing, propaganda, or recruitment. Some women were even involved in terrorist plots in Europe as early as 2014, culminating in the first all-women failed terrorist attack in Paris in September 2016. In 2016, a German teenage girl also stabbed a police officer in the name of ISIS, and was convicted and sentenced to six years in prison. In 2023, in Belgium, a jihadi-inspired terrorist plot involving several men and women was also thwarted.

Overall, the perception of female VEOs by security services evolved progressively, as explained in this book. As the terror threat in Europe increased significantly, and as more women were returning from the so-called caliphate, women were no longer perceived as victims, but rather they became increasingly seen as perpetrators, offenders, and even a security threat. This book looks at the criminal justice approaches adopted by Belgium, France, Germany, and the Netherlands to deal with these female VEOs.

Female VEOs - New Data, New Insights

This book is the result of a research project which started from the recognition that female VEOs represent a growing challenge for security services, notably in Europe. At the same time there are significant knowledge gaps due to the limited literature and data available on female VEOs which largely restricts the understanding of this phenomenon and the capacity to inform evidence-based policies. One of the key aims of this project was therefore to produce new knowledge, based on a unique dataset of 283 court decisions and 69 interviewees with relevant stakeholders in four countries (France, Belgium, Germany, and the Netherlands), as a contribution to both the academic literature and to counter-terrorism policy-makers and practitioners.

The key objective of this project was to understand how female VEOs are managed throughout the criminal justice system, and in particular whether there are some specific aspects or challenges linked to gender. The project also looked at the evolution of this response over time. Specifically, the research conducted for this project looked at the prosecution, prison management, rehabilitation, and reintegration of jihadi female VEOs in Belgium, France, Germany, and the Netherlands between 2012 and 2023. Although this work uncovered some

interesting data about women's profiles and roles in terrorism, this was not the primary goal. Indeed, in the under-developed literature on female VEOs, more attention has been given to the profiles, roles, and trajectories of women than to the counter-terrorism responses.¹²

Against this backdrop, this book aims to provide new insights on the criminal justice response to female VEOs. The first key insight is that it appears that, at least initially, many female returnees were treated more leniently by the criminal justice system, hence raising questions of whether there is a gender bias when it comes to the prosecution and sentencing of female VEOs. The second insight is that the growing number of female VEOs in prisons presents an unprecedented challenge to the penitentiary administration in terms of prison regimes, management, and risk-assessment. This is particularly in light of the profiles of some female returnees that remained many years in Syria and Iraq and who have experienced prison-like camps in Syria. This raises questions about the need (or not) for specific prison management approaches for female VEOs. The third key insight is that very little empirical data is available on the effectiveness of rehabilitation programmes for VEOs within or outside the prison context, let alone female VEOs. A key issue is whether there is a need for gender-specific or gender-sensitive programmes, and what these programmes should look like. Fourth, as several female VEOs have already left prison, or will leave prison in the coming years, the risk of terrorist recidivism among female VEOs remains unknown. Finally, this project paid attention to the issue of children as many female returnees were repatriated with their children, which had a clear impact on the sentencing, as well as their rehabilitation and reintegration processes.

Previous Research on Female Terrorists

Although women have long been part of terrorist organisations, and even played very active roles in some of these organisations, they have historically been largely neglected in academic research. More research has nonetheless been published on female terrorists or gender and extremism in the past two decades, allowing for some preliminary observations of interest to this project.

Research has shown that women might play a wide variety of roles within terrorist organisations, from supporting to leading roles, and that they can contribute in important ways in advancing the aims of terror groups.¹³ It is estimated that women have been active participants in most terrorist organisations in history. Some terrorist organisations had a very significant female membership, for instance, women represented up to 40 percent of the Revolutionary Armed Forces of Colombia (FARC). Some terrorist organisations have been founded by women – such as the far-left Baader-Meinhof group in Germany, in the 1970s – or were composed almost exclusively of women, such as the far-left US-based May 19th group, which was a splinter group of the Weather Underground Organisation established in the late 1970s.¹⁴

Most research highlights the agency of women in joining a terrorist organisation, as opposed to the "jihadi brides" narrative largely present in the media, that portray women as naive victims. ¹⁵ In contrast to a certain perception that women would be essentially non-violent, research actually demonstrates that about a third of suicide terrorist attacks committed prior to 2000 were committed by women, and some groups such as the Tamil Tigers, active in Sri Lanka in the 1990s, had all-women combat units. ¹⁶

In terms of profiles, one rare study that builds on a large sample of jihadi female terrorist profiles in the West (N=272), found that women were in general relatively young when radicalising (22.5 years old on average), very similarly to men. In another study comparing 182

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women and 1,685 men from a dataset on US-based radicalised individuals, as many similarities as differences were found across gender in terms of profiles.¹⁷ A key difference between male VEOs and female VEOs was related to criminal records: women were much less likely to have previously engaged in criminal activities, a finding we also confirm in our book.¹⁸

Many terrorist groups have well understood the strategic importance of recruiting women. ¹⁹ Indeed, gender bias among security stakeholders sometimes resulted in less attention to (potential) female terrorists. ²⁰ Furthermore, women usually receive more media attention, which can result in more publicity for the group. ²¹ Finally, women could also be recruited to simply increase the membership base of the terrorist organisation. ²²

Understanding the variety of profiles and the full scope of the roles that women play in terrorism is paramount to ensuring proper accountability in the face of justice, as well as to tailoring rehabilitation and reintegration measures.²³ Reducing women's engagement in political violence to basic stereotypes such as "bad mothers", "whores", or "monsters", and essentially as deviant women, is not the best guide to effective policy responses.²⁴ However, even in this growing body of literature there is a gap related to criminal justice and counter-terrorism responses to alleged female terrorists.

Research has demonstrated that women are generally treated more leniently than men by the criminal justice system.²⁵ They are overall less likely to be prosecuted, less likely to be convicted, less likely to receive long sentences, and less likely to be imprisoned. The small share of women in the prison population worldwide raises the question of whether women are genuinely less likely to commit a crime, or whether they are indeed treated differently by the criminal justice system. Although very little research has been conducted on the prosecution of female terrorist offenders specifically, some findings suggest indeed a perpetuation of this bias. During trials, female terrorists have often been presented as victims, mere followers, or naive lovers by their lawyers, the media, and themselves. This is still as true today as seen during trials of female ISIS returnees, as it was during the trials of ETA female members in Spain, or far-left terrorists in France in the 1980s.²⁶ In a rare empirical study of court decisions in the United States (US) and Canada, Omi Hodwitz demonstrated that female VEOs were less likely to be sentenced than their male counterparts and, when they are convicted, more likely to receive shorter sentences.²⁷ Research from the United Kingdom (UK) also suggests that female extremists are less likely to be prosecuted and charged than men.²⁸ In other parts of the world, for instance in the Western Balkans or in Morocco, female returnees are mostly considered to be victims or non-combatants, and are therefore often not prosecuted, as opposed to men.²⁹

Another very recent strand of research has started to look at the prosecution of female returnees in several countries, looking notably at the types of charges, access to evidence, and rates of convictions for women. It also explored the notion of cumulative charging for terrorism crimes, domestic crimes, and core international crimes.³⁰ In doing so, research has shown that the prosecution of female returnees for core international crimes has evolved. For example, some of the research demonstrates that women are increasingly being prosecuted for their involvement in (sexual) slavery as crimes against humanity.³¹ Additionally, charges on gender and religious grounds are also being included in such prosecutions more frequently.³² Nonetheless, cumulative charging of female VEOs has not been uncriticised, especially in relation to the fact that the first prosecutions for pillaging as a war crime were only targeting female perpetrators, whereas men did not face this specific charge.³³ Against the background of additional case-law, this prosecutorial approach will be further analysed in this book.

Despite the growing attention to the role of women in terrorist groups, there is still only very little research into the specific risks and needs of female VEOs in prison, and how to assess

and address these.³⁴ In some rare research about this aspect in France, one finding noted that religiosity was perceived very differently in the management of male and female prisoners. It was less visible, and perceived by staff as less threatening, amongst women than amongst men.³⁵ Some scholars and practitioners have identified the need to further investigate gender-specific needs of female VEOs,³⁶ whereas other research has highlighted the absence of specific research into psychopathology as a risk factor for female terrorist offenders.³⁷

European practitioners have noted that gender-sensitive practices and policies for female inmates do not sufficiently address the situation and needs of female VEOs who were often not involved in violent conduct, experienced multiple traumas, and were overall incarcerated for shorter periods, leaving less time for in-prison rehabilitation and de-radicalisation measures.³⁸ It is acknowledged that finding gender-sensitive approaches to female VEOs is of pressing importance, given the increasing number of female returnees from Syria and Iraq, although these recommendations are rarely based on strong evidence due to the limited research available.³⁹

There is also little data available on how many female VEOs have undergone rehabilitation measures, and if so, which measures specifically. Some practitioners have identified several alleged good practices for the rehabilitation of female VEOs, 40 although the foundations for supporting these claims are not always clear. 41 Some recommendations usually include the need to start rehabilitation as early as possible, ideally by involving family members and social services. For female returnees, maintaining a connection with their children is considered paramount, as well as reconfiguring the role of motherhood to develop appropriate bonds with their children in a new environment. 42 It is also noted that strategic communications with communities receiving these women back is essential to avoid stigmatisation and create awareness for the situation and needs of female VEOs. Moreover, information sharing between different services has been identified as key to successful rehabilitation of female returnees, especially when prison sentences are often too short to participate in and complete meaningful rehabilitation programmes in prison, or where detention is limited to pre-trial detention. Thus, the exchange of information between prison workers and outside social services is crucial to facilitate the smooth transition when they exit prison. 43

Overall, the existing literature on female VEOs and their management throughout the criminal justice chain is still somewhat limited and, above all, lacks clear data or strong empirical evidence to derive new scientific and policy-relevant knowledge. Most existing studies, with a few exceptions, rely exclusively on open-source material or secondary sources, and lack a systematic approach. There are therefore significant gaps in the current understanding of female VEOs, and how to manage them through the criminal justice system. This project seeks to address these gaps by providing evidence-based insights, founded notably on the detailed analysis of 283 court cases.

Methodology

This project focussed on jihadi female VEOs in Europe. It looked at the women who travelled to join a terrorist organisation abroad, some of whom returned, but also at women who were prosecuted for terrorism without (attempting to) travel abroad or who failed to travel. To keep some consistency in the sample, it is narrowed to women prosecuted in relation to jihadi terrorism, therefore excluding cases linked to other ideologies. This only had a limited impact on the size of the sample, however, as few women have been prosecuted for other forms of terrorism in Europe over the past decade.

In terms of timeframe, all cases that pre-dated the conflict in Syria were excluded. The sample is therefore largely dominated by ISIS- and Syria-related cases between 2012 and 2023, ensuring greater consistency. Furthermore, given the very significant changes that have occurred in the European counter-terrorism landscape since 2012, this timeframe allows to maintain some consistency in assessing the threat and policy landscape.

Since a consistent problem in the study of female terrorists is the low number of cases, this project compiles data across several countries. This book focuses on female VEOs in Belgium, France, Germany, and the Netherlands. These four countries together represented more than half of all adults who travelled to Syria and Iraq to join a jihadist terrorist organisation. All four countries had a significant number of women convicted for terrorism in the past years. ⁴⁴ From a comparative point of view, these countries were also interesting as despite all of them being Western European member states, they showcase different institutional structures and differ in their counter-terrorism responses and judicial systems.

The findings presented in this book are based on an interdisciplinary, mixed-methods approach. First, a unique dataset of case-law relating to female VEOs was compiled. This was based on the compilation and coding of 283 court cases obtained across the four countries, representing a total of 277 individuals which were available on-line or provided by the prosecutors upon request by the authors. This not only includes cases in which individuals have been convicted, but also cases resulting in acquittals. Additionally, information on ongoing investigations and trials was collected to corroborate findings on trends and developments. Second, 69 practitioners, experts, and policy-makers working on the prosecution, prison administration, rehabilitation, and reintegration of female VEOs in the four countries, as well as some female VEOs in France, were interviewed (discussed below). Thirdly, research was informed by existing literature and policy documents. Finally, early findings were discussed with fourteen practitioners from all four countries studied, during a workshop organised in The Hague, Netherlands in June 2023.

Interviews

Relevant stakeholders, practitioners, and experts in prosecution, prison administration, rehabilitation, and reintegration of female VEOs in Belgium, France, Germany, and the Netherlands, as well as six female VEOs in France, were interviewed for this project (Belgium (8), France (30), Germany (18), Netherlands (19)). Semi-structured interviews were conducted by the four national country experts (the chapters' named authors) based on a common list of questions. Due diligence was given to informed consent, confidentiality, and anonymity, as well as data protection. One-off interviews were conducted either in person or online and averaged one to two hours. Where the interviewees consented, the interviews were audio-recorded. Conversations focused on the knowledge, experience, and perceptions of interviewees concerning radicalisation and backgrounds, prosecution, risk assessment, and prison administration, as well as rehabilitation and reintegration of female returnees and VEOs in their respective countries. The precise focus of the discussions shifted pursuant to the interviewees' professional background.

Data Collection

The use of court decisions in the study of terrorism, and particularly of female terrorist offenders, is still limited. It is arguably even rarer in a comparative context across multiple countries. As such this book provides new and unique data to the field. Nonetheless, some

important limitations must be noted. Firstly, the method to identify relevant cases was different in each country, with none guaranteeing complete exhaustiveness of cases. As a result, some cases of female VEOs might be missing from the dataset. Secondly, the amount of information available for each case varied significantly. Some court decisions were long and included extensive information, whereas others were very limited in the information provided. Furthermore, some court cases were obtained in an anonymised format, which made part of the coding process difficult or impossible, resulting in some loss of information. The policies and practices on the publication of court decisions varies significantly across and within the four countries making it difficult to obtain full judgments in all cases. 45

Finally, it is worth clarifying that the starting point to collect cases was the initiation of criminal proceedings, not the conviction. As a result, the dataset includes several acquitted individuals. Such information was useful to evaluate prosecution practices. However, these cases were removed from calculations when extracting profile data on female VEOs, as result of their non-guilty verdict.

Dataset Coding

Four distinct country-specific databases of female VEOs prosecuted for terrorism offences, and where applicable additional domestic or core international crimes, were created from information made available as described above. In doing so, a 'case' was understood to relate to one individual woman. Cases with two or more female co-defendants are hence counted as multiple cases. Given the interdisciplinary nature of the research, the country-specific datasets were divided into two sections each - one compiling legal data, and one compiling context data. The first section on legal data included details relating to:

- 1. Name (first name and initial of last name) and case number(s);
- 2. Links to relevant decision(s) and other publicly available information;
- 3. Type of criminal procedure such as juvenile justice, plea agreements, or trials in absentia;
- 4. Case status detailing whether a case is under investigation, awaiting trial, on trial, and when on trial or appeal, at which instance;
- 5. Group(s) that the individual was allegedly affiliated with;
- 6. Nationality of the defendant, including second nationality where applicable;
- 7. Information on charges included in the indictment were divided into three categories: core international crimes, terrorism offences, and domestic offences;
- 8. Information on the verdict was collected chronologically, portraying decisions made throughout the different instances;
- 9. Length and type of sentence, including applicable probation measures and/or reparation payments were also collected chronologically pursuant to the different instances;
- 10. Indictment period, calculated as a starting date (month/year) and ending date (month/year);
- 11. Whether the individual was in pre-trial detention or not; and
- 12. All available dates relating to arrest and trial proceedings.

A second section relating to context data was also developed which included details on:

- 1. Date or year of birth of the alleged perpetrator where available;
- 2. Criminal record of the alleged perpetrator;
- 3. Citizenship status, in case it was revoked;

- 4. Parental status at commission of crimes, on first trial day, and on day of first verdict;
- 5. Activities carried out by the accused and adjudicated on trial based including logistical support, arranging travels, financing, recruitment, propaganda, receiving training, giving training, incitement, plotting, and other;
- 6. Travel arrangements detailing whether the individual travelled to the conflict zone in Syria or Iraq, stayed in her country of residence, or failed to travel abroad, as well as how the person returned, if applicable; and
- 7. A short case summary, briefly explaining the case matter in a narrated style.

To allow for cross references, internal case codes and names of defendants and case numbers were the same in both the first and second section. While the first dataset sought to compile more detailed data, for example relating to religious backgrounds and mental health of the women, this data was often not available due to its sensitive nature, and thus not systematically collected.

Definitions Used

This book relies on information from four different domestic legal jurisdictions. Despite slightly different criminal procedures across the four countries, for example in relation to the number of available courts or the existence of centralised courts and prosecution offices in contrast to federalised mechanisms, the terminology used to describe these procedures (when translated to English) was largely the same. While criminal procedures in the four civil law countries rely on common terminology, the language used in the provisions of material law differ. Additionally, the four countries have not all criminalised the same conduct. Regardless, "prosecution" is understood as the process of holding alleged perpetrators accountable for their actions by respective authorities, spanning the entire chain of criminal proceedings from initial investigations to final verdicts or termination. To allow for a comparison of the prosecution of female VEOs in the four countries, common definitions were used when analysing data, and these definitions are also used throughout this book, such as for example "membership in a terrorist organisation" which captures the different modes in which the four countries have criminalised different levels of participation in a terrorist organisation. Given that all four target countries are member states of the European Union (EU), definitions relating to terrorism and terrorist offences were taken from Directive (EU) 2017/451 of the European Parliament and of the Council of 15 March 2017 on combating terrorism and replacing Council Framework Decision 2002/475/JHA and amending Council Decision 2005/671/JHA (2017 EU Directive on combating terrorism). 46 Terminology relating to so-called core international crimes, which for the purpose of this book include war crimes, crimes against humanity, and genocide, were borrowed from the Statute of the International Criminal Court (Rome Statue) and corresponding Elements of Crimes. 47 This was done against the background of State parties to the International Criminal Court (ICC) having used the Rome Statute as a blueprint for their domestic laws on core international crimes, when incorporating these into domestic legislation. Country-specific terminology and findings can be found in the respective country chapters.

Additionally, when referring to "travellers" throughout this book, this includes individuals who successfully travelled to a conflict zone to join a terrorist organisation there. Once they returned to their home country, they are labelled as "returnees". Individuals who were prevented from travelling to join a terrorist organisation at home or in a third state, such as for example Turkey,

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¹ An interesting approach for future research could be the assessment of prosecution, rehabilitation, and reintegration of female VEOs in one or more common law countries.

are referred to as "failed travellers". This distinction is made to highlight the fact that while these individuals made travel arrangements and did some part of the travel, they did not manage to go through with their plans and did not spend any time with a terrorist organisation abroad. "Travellers" are commonly referred to as "foreign terrorist fighters" (FTFs) or foreign fighters. This category usually encompasses all adults – both men and women. ⁴⁸ In some countries, such as Belgium, FTF is more than a concept, it is also a legal category in the database on extremist offenders, applicable again to both men and women.⁴⁹ However, the term has also been criticised for various reasons. Firstly, the notion of 'foreign' was considered to be misleading, not least by the former Dutch Minister of Foreign Affairs, Bert Koenders, who noted that these individuals "are not foreign at all. They may be foreigners in the countries where they are going to. But [...] [t]hey are part of our societies."50 Secondly, the definition of FTF used in UNSC 2178(2017) conflates armed conflict and terrorism.⁵¹ By labelling them as foreign "terrorist" fighters, the focus is set on counter-terrorism aspects while international humanitarian law is often excluded from the picture. 52 This is particularly counter-productive when managing these individuals through the criminal justice chain, as it often ignores the full range of crimes committed by them, and emphasises a security approach over full accountability.⁵³ The Office for Democratic Institutions and Human Rights (ODIHR) at the Organization for Security and Co-operation in Europe (OSCE) highlighted that individuals who joined terrorist organisations abroad had different profiles and were engaged in different types of activities – a fact that was also confirmed by the present research in relation to women – and concluded that labelling such a diverse group as FTFs is misleading.⁵⁴

Without necessarily taking sides on this issue, and assuming that the findings in this book are more important than semantic debates, the terms foreign fighters (FF) or FTF have been used conservatively throughout. Instead, the term "female violent extremist offender" (female VEO) was preferred throughout this book as it more precisely reflects the multitude of different activities that these women were involved in, encompassing both violent and non-violent activities. In doing so, female VEOs in this book refer to the entire group of women allegedly involved in terrorist activities both at home and abroad. To provide for even more precision, terms such as "female traveller", "female returnee", or "female violent extremist offender" were used where applicable describing the precise status of these women.

Book Structure

This book includes four country chapters that detail the context-specific frameworks and practices of female VEOs' journey through the domestic criminal justice systems. Looking at the prosecution phase, these chapters assess how many women have been charged, convicted, and acquitted for which crimes. The chapters further elaborate on different types and length of sentences, and other legal responses to threats posed by female VEOs. All these assessments take the special needs of women, for example relating to their parental status, into account. This approach also guides the analysis of prison arrangements for these women in the different countries, focusing on specialised capacities for female VEOs, risk assessment tools, and inprison rehabilitation and reintegration programmes. Finally, a look at the post-release rehabilitation and reintegration arrangements in the four countries provides insights into gender-specific approaches and obstacles faced by the women and relevant services. The final chapter offers a thorough cross-cutting analysis of common gaps, needs, challenges, and good practices observed in Belgium, France, Germany, and the Netherlands. Drawing on the analysis of our entire dataset, this chapter identifies some interesting commonalities and differences across countries.

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This project aims to inform practitioners and policy-makers involved in the management of female VEOs throughout the criminal justice chain. Both the country-specific findings as well as the cross-cutting observations made in this book can, in the long-term, contribute to a human rights and rule-of-law compliant enhancement of accountability for the full range of crimes committed by female VEOs, the improvement of gender-sensitive prison management, and the enhancement of effective rehabilitation and reintegration for female VEOs.

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¹ Algemene Inlightingen en Veiligheidsdienst (AIVD), "Jihadist women, a threat not to be underestimated," December 14, 2017, https://english.aivd.nl/publications/publications/2017/12/14/publication-jihadist-women-a-threat-not-to-be-underestimated.

² UN Security Council Resolution 2396(2017), S/RES/2396, 21 December 2017, para. 31, https://undocs.org/Home/Mobile?FinalSymbol=S%2FRES%2F2396(2017)&Language=E&DeviceType=Deskto p&LangRequested=False.

³ Figures should always be considered with caution when it comes to FTF numbers. Two important studies looked at European FTFs, with a particular eye to the gender dimension. While both studies indicate a rate oscillating around 15-17 percent, the number is likely higher since that ratio is estimated around 20 to 30 percent in the countries that had the highest contingents of FTFs, like France, Germany, and Belgium. See Bibi van Ginkel, and Eva Entenmann, "The Foreign Fighters Phenomenon in the European Union. Profiles, Threats and Policies", Report, *The International Centre for Counter-Terrorism*, April 2016, ICCT-Report_Foreign-Fighters-Phenomenon-in-the-EU_1-April-2016_including-AnnexesLinks.pdf; Joana Cook, and Gina Vale, "From Daesh to 'Diaspora' II: The Challenges Posed by Women and Minors After the Fall of the Caliphate," CTC Sentinel, vol. 12, 6, July 2019, From Daesh to 'Diaspora' II: The Challenges Posed by Women and Minors After the Fall of the Caliphate – Combating Terrorism Center at West Point.

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