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5

The Dutch Approach to Female Violent Extremist Offenders

Tanya Mehra

According to the Dutch Intelligence Service, approximately 300 persons have left the Netherlands for Syria and Iraq to join a terrorist organisation. Most of them have joined the 'Islamic State' (ISIS) while a small number of persons have joined other terrorist groups such as Jabhat al-Nusra.¹ One third of the so-called foreign fighters were women. So far, approximately ten Dutch women have died, 41 have returned, and a few women have returned to a third country.² According to the latest threat assessment of the Dutch Intelligence Service, around twelve Dutch women are still detained in the camps administered by the Autonomous Administration of North and East Syria (AANES) and are keen to leave presumably to the Netherlands.³ Another twelve women are deemed to be in Northeast Syria and the region with a dozen more staying with different terrorist organisations abroad (Figure 5.1).

Of those who travelled to Syria and Iraq, 73.7 percent of the women were childless when they left the Netherlands. Regardless of whether the women travelled to the conflict zones or not, they were all prosecuted for terrorist conduct in relation to ISIS. On average, the women were 23.8 years old at the start of the commission of the crimes.

Returns of women from Syria and Iraq, just like their departures, took place in waves. The first wave of returnees occurred even before ISIS established the so-called caliphate between 2013 to 2014. The second wave of returnees took place after ISIS established the caliphate from early 2015 onwards.⁴ By now, a third wave can be identified, starting after the fall of Baghuz in 2019.

Three methods of return can be identified: voluntarily; extradited; and repatriated. From the dataset, we can see that of the 28 women prosecuted in the Netherlands so far, a majority of nineteen women travelled to the conflict zone. The remaining nine women were either in the Netherlands or in a third state, and five did not attempt to travel at all (Figure 5.2).

Most of the women who have returned voluntarily did so during the first wave, while those that have been extradited predominantly returned during the second wave, and the women who have been actively repatriated returned during the third wave. The Netherlands has so far carried out three active repatriations. The first woman to be repatriated in June 2021 was Ilham B. together with her three children. Five women and their eleven children were repatriated in February 2022 and finally twelve women and their 28 children were repatriated in November 2022. While most of them travelled to Syria or Iraq, five women did not travel nor attempted to travel to Syria or Iraq.

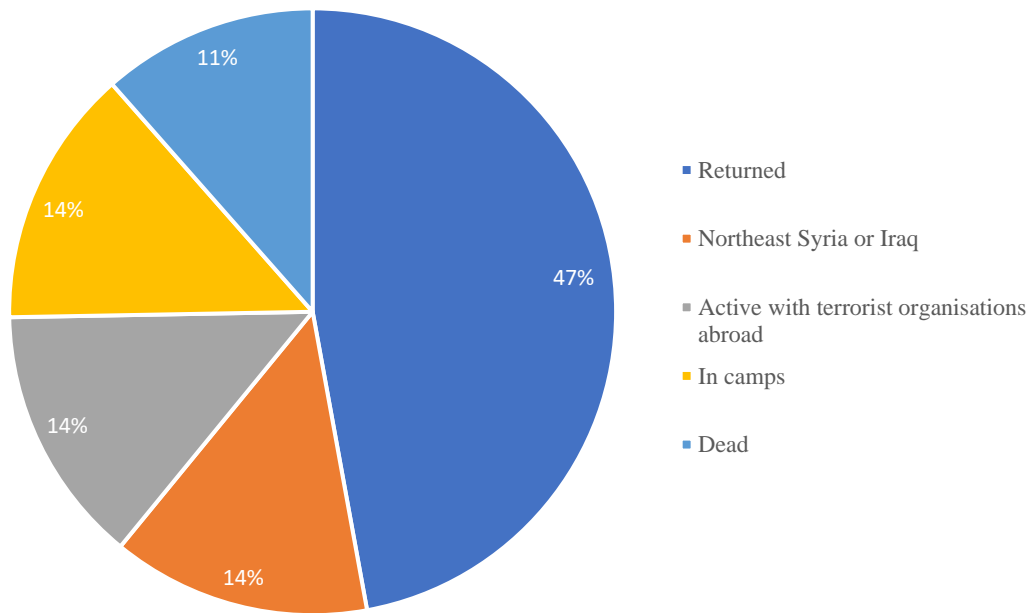


Figure 5.1: Status of the 100 women who left the Netherlands to Syria and Iraq (numbers provided by Dutch intelligence services; as of November 2023)

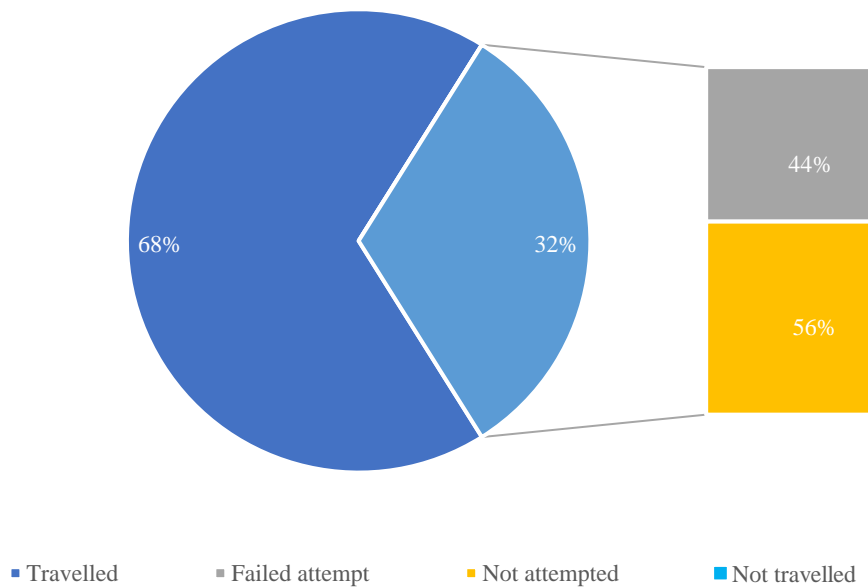


Figure 5.2: Travel arrangements of female VEOs prosecuted in the Netherlands, (n=28; as of 15 July 2023)

There were not many female violent extremist offenders (VEOs) in The Netherlands prior to the rise of the ISIS. Perhaps one of the striking examples is Soumaya S. She was the first woman convicted for terrorist offences in the Netherlands. She was sentenced to three years in prison in 2014 for membership in a terrorist organisation and for possession of firearms. Soumaya S. belonged to the Hofstad group, which was plotting a terrorist attack on several politicians. Interestingly, one of the other members of the Hofstad group, Samir A., who stood trial together with Soumaya S., was convicted for plotting a terrorist attack and was released from prison in 2013 and was convicted again in 2022. This time for funding and helping women to escape from the camps in Northeast Syria.⁵ During her time in detention, Soumaya S. studied political science and later on became an advisor on terrorism and radicalisation for the liberal party, People's Party for Freedom and Democracy (VVD). After parliamentary questions, Soumaya S. stepped down from her function in early 2022 and was expelled from the party in October 2023 for allegedly financially benefiting from her mentor and former party leader Frits Bolkenstein.

One of the first female returnees who was prosecuted in the Netherlands was Laura H. who travelled, together with her husband and two young children, to ISIS-controlled territory in September 2015.ⁱ She made headlines in July 2016 when she surrendered to Kurdish forces near the ISIS-held city of Mosul in northern Iraq. The court ruled that citizenship – being a citizen and living under ISIS – does not constitute membership in a terrorist organisation, but in subsequent cases abandoned this reasoning. Laura H. became one of the best-known female returnees in the Netherlands with a book and a theatre play about her life being released.

This country chapter will provide a descriptive overview of the current state of play in the prosecution, prison management, rehabilitation, and reintegration of female VEOs in the Netherlands. It is based on research and on a dataset that has been collected through open sources. As of 15 July 2023, this dataset consists of 40 cases of female returnees and VEOs that were initiated between 2012 and July 2023. In total, 28 female returnees have stood trial, in six cases appeal is pending, twelve more are under investigation (Figure 5.3). In addition, nineteen in depth semi-structured interviews have been conducted with relevant stakeholders working in the prosecution, prison management, rehabilitation, and reintegration of female returnees and VEOs.

Prosecution

The Dutch policy is that both men and women should ideally be prosecuted in the region where the crimes have been committed unless it would lead to impunity, in which case they would be repatriated and stand trial in a Dutch court.⁶ The vast majority of women who have currently been prosecuted have actually travelled to the conflict zone. In total, nine women have not travelled. Two of them failed to depart from the Netherlands and two failed to travel on to Syria or Iraq from a third country. Another five women had not attempted to travel to the conflict zone at all. Out of the 28 women who have stood trial, only two were prosecuted under juvenile justice laws.

A significant number of women are still being investigated and are awaiting trial. This includes the twelve women who have been repatriated in November 2022. They are deemed to be more committed to ISIS ideology and are charged with more serious offences. This includes Hasna A. who in addition to membership in a terrorist group, has been charged for slavery as a crime

ⁱ In fact, the first female returnee who was prosecuted was Shukri F., she was prosecuted together with her husband, she was acquitted for membership of a terrorist group but convicted for incitement to terrorism.

against humanity, and Krista van T. who is facing charges of pillaging as a war crime. The dataset shows that, other than the twelve women still under investigation, 22 women have received their final verdict, and six have their case pending on appeal (Figure 5.3).

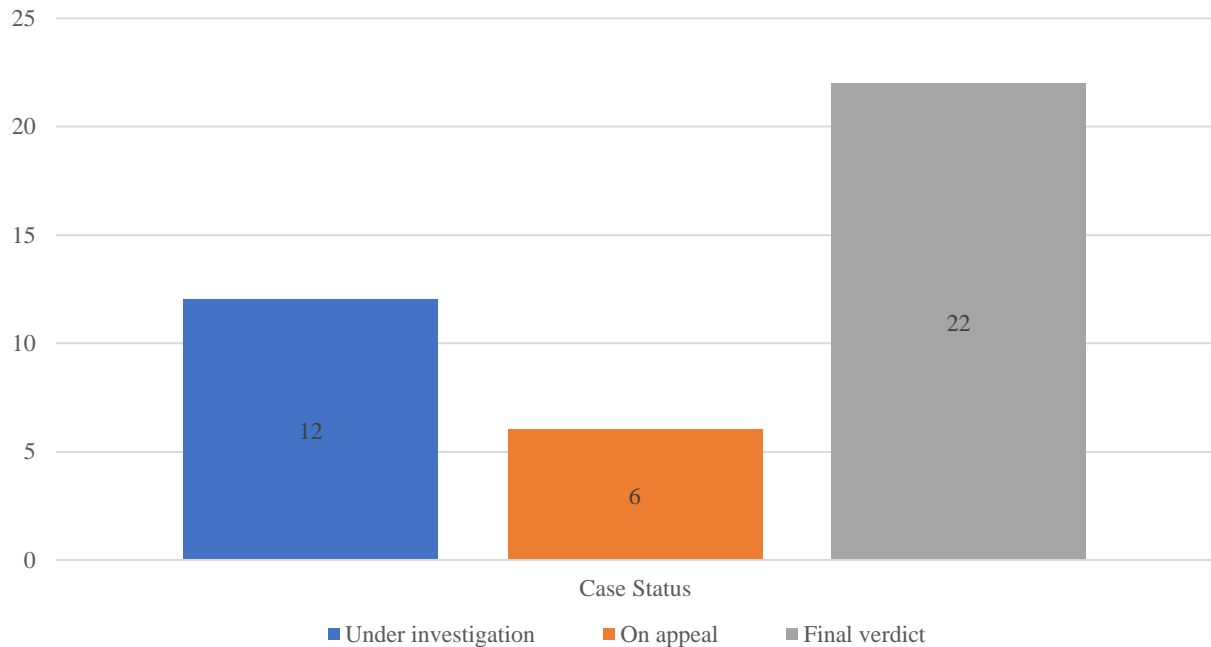


Figure 5.3: Case status of prosecutions of female VEOs in the Netherlands (n=40; as of 15 July 2023)

Prosecutorial Strategy

In the Netherlands, the National Prosecutor's Office is responsible for prosecuting a range of serious offences including terrorism.⁷ After the investigations have been concluded, the prosecutor has the discretion to decide to prosecute or not (article 167 Dutch Criminal Procedure Code). Under the expediency principle the prosecutor may decide not to prosecute if this would not be in public interest.⁸

During the first wave of returnees in 2012/2013, women were not seen as suspects but were mainly heard as witnesses. Over time, the understanding of the conflict and the different roles of men, women, and children in ISIS improved. The publication '*Life with ISIS: the Myth Unravelling*' of the Dutch Intelligence Service (AIVD) contributed to a better understanding amongst relevant Dutch authorities.⁹ Since 2015/2016 the Prosecutor's Office adopted a policy to actively investigate, and where possible, prosecute so-called foreign fighters, including women. This means that a criminal file will be opened for known foreign fighters, including women while they are still abroad.¹⁰

The Dutch Prosecutor's Office charges each returnee for participation in a terrorist organisation (article 140a Dutch Criminal Code) and preparing crimes with a terrorist intent (article 96 Dutch Criminal Code). After the territorial defeat of ISIS, more information about how ISIS operates and about life during the so-called caliphate became available. As of 2021, The Dutch Prosecutor's Office requests a standard sentence of five years imprisonment for returnees and six years for those who were involved in fighting. The reason for requesting higher sentences is based on the relatively longer duration of the defendants' stay in the conflict zone and the

type of activities they have been involved in, such as joining a specific brigade, contributing to propaganda or recruitment activities. Furthermore, as of 2021, women who have deliberately taken their children to Syria or Iraq are also being prosecuted for child neglect (article 255 Dutch Criminal Code).¹¹ Gender is not taken into account in determining which charges should be laid. Over the years, the Dutch Prosecutor's Office has gained experience in prosecuting female returnees and has also relied on expertise from other disciplines.ⁱⁱ

Trials in Absentia

In the Netherlands, like in many other European countries, trials *in absentia* are permitted under certain conditions. If the prosecutor decides to investigate and prosecute a person who is still abroad, the standard procedure is to issue an international arrest warrant against this person. The prosecutor will need to inform the accused of the date and time of the trial. On several occasions, the Prosecutor's Office posted the details of such trials on social media. As the defendant has the right to be present during the trial, the court needs to put the proceedings on hold if the defendant indicates that they want to be present during the trial but are still abroad.

While trials *in absentia* were part of the prosecutorial approach to build a case against a person before they return to the Netherlands, this approach eventually had to be abandoned.¹² Ilham B. who was in Ain Issa camp in Northern Syria at the time, indicated she wanted to be present at her trial in the Netherlands. The court decided to stay the proceedings several times to allow the authorities to bring her to the Netherlands so she could stand trial. In the end, the court concluded that it was unrealistic that the defendant would be brought to the Netherlands to stand trial and was about to terminate the proceedings.¹³ Pursuant to article 29f of the Dutch Criminal Code, this would have meant that it was no longer possible to prosecute Ilham B., even if she were to return to the Netherlands at a later time. To avoid impunity, the Dutch government decided to repatriate Ilham B. so she could stand trial. In June 2021, Ilham B. was repatriated together with her three children. Ilham B. travelled together with her future husband to Turkey, where he received a salary of USD 100 a month from ISIS. The couple lived in a house supplied by ISIS. Not only did her husband have a weapon, Ilham B. also had her own weapons and was active on social media praising the life in the caliphate. Ilham B. was convicted for joining the terrorist groups Jabhat al-Nusra and ISIS and for the preparation of terrorist offences, but only up to the point when she was captured by the Syrian Democratic Forces (SDF). She was sentenced to three and a half years imprisonment of which 12 months were conditional. In addition to her prison sentence, she was given a two-year probation period under seven special conditions.¹⁴ The Prosecutor has appealed the verdict, arguing that Ilham B. was also involved in providing training to 40 women of the Al-Khansaa Brigade, an all-women unit in charge of religious enforcement.

A few months after Ilham B.'s repatriation, in February 2022, another five women and their children were repatriated for the same reasons and then prosecuted. In November 2022 twelve women and 28 children, the biggest group so far, were repatriated. As of 1 December 2023, none of the women have been sentenced.

ⁱⁱ The police also rely on multidisciplinary expertise and works with legal, linguistic, and religious experts. This applies to the Team International Crimes as well as National Police, Countering Terrorism, Extremism and Radicalization.

Offence	Criminal Provision	Number of Indictments	Number of Convictions
Membership in a terrorist organisation	Article 140a Sr.	23	14
Preparation of terrorist offences	Article 96 Sr.	14	14
Incitement to terrorism	Article 131f. Sr.	5	4
Financing of terrorism	Article 421 Sr.	4	2
Recruitment for terrorism	Article 205(3) Sr.	2	0
Providing or receiving terrorist training	Article 134a Sr.	1	1

Figure 5.4: The most commonly applied terrorism charges in cases of female VEOs in the Netherlands (n=28 cases; as of 15 July 2023)

In addition to membership in a terrorist organisation and preparing terrorist offences, the prosecutors have also charged women for several other terrorist offences. As exemplified by the data, other less commonly charged and convicted terrorist offences include incitement to terrorism, recruitment for terrorist purposes, terrorism financing and one case of providing or receiving terrorist training (Figure 5.4). In the vast majority of cases, female returnees and VEOs have not directly been involved in the violent (terrorist) crimes. In some cases, the women had access to weapons, which were kept in the house but were not engaged in combat.

Cumulative Charges

Cumulative charging describes the charging of an individual with terrorist offences and domestic crimes or core international crimes. In the Netherlands female VEOs have been charged with terrorist offences and domestic offences, such as child neglect and violating sanctions laws. Furthermore, prosecutors can cumulatively charge for terrorist offences and core international crimes. The exclusion clause that regulates the applicability of terrorism legislation during an armed conflict is interpreted narrowly in the Netherlands. The exclusion clause is only applicable to armed forces and not to non-state-armed groups. This means that it is not applicable to ISIS and other terrorist organisations. A member of ISIS can therefore be tried for both terrorist offences *and* war crimes.¹⁵ While cumulative charging is possible, the dataset showed that the majority of indictments and convictions – twenty-four and nineteen respectively – filed against female VEOs involved only terrorist offences (Figure 5.5).

In the current dataset, only one woman has been convicted for a terrorist offence, core international crimes, and domestic offences: Yousra L. Most notably, she was convicted for committing a war crime from within the Netherlands. It was also the first case in which the court concluded that ISIS was not only a terrorist organisation but also a criminal organisation with the aim to commit international crimes. The reasoning for this is that ISIS is a criminal organisation with the intent to commit war crimes because it has intentionally violated common article 3 of the Geneva Conventions, in particular by killing persons and committing outrage upon personal dignity of protected persons. Yousra L. was convicted for incitement to war crime of outrage upon personal dignity, membership in a terrorist organisation, terrorism financing, and participation in terrorist training.¹⁶ Yousra L. has appealed the verdict.

Participation in a Terrorist Organisation

Participation in a terrorist organisation is one of the two most common crimes that female returnees have been convicted for. To prove participation/membership in a terrorist organisation, three elements need to be proven:

- the existence of a structural association of two or more persons with some form of continuity;
- the terrorist intent of the organisation; and
- the participation and contribution of the individual to the organisation that has a terrorist objective.

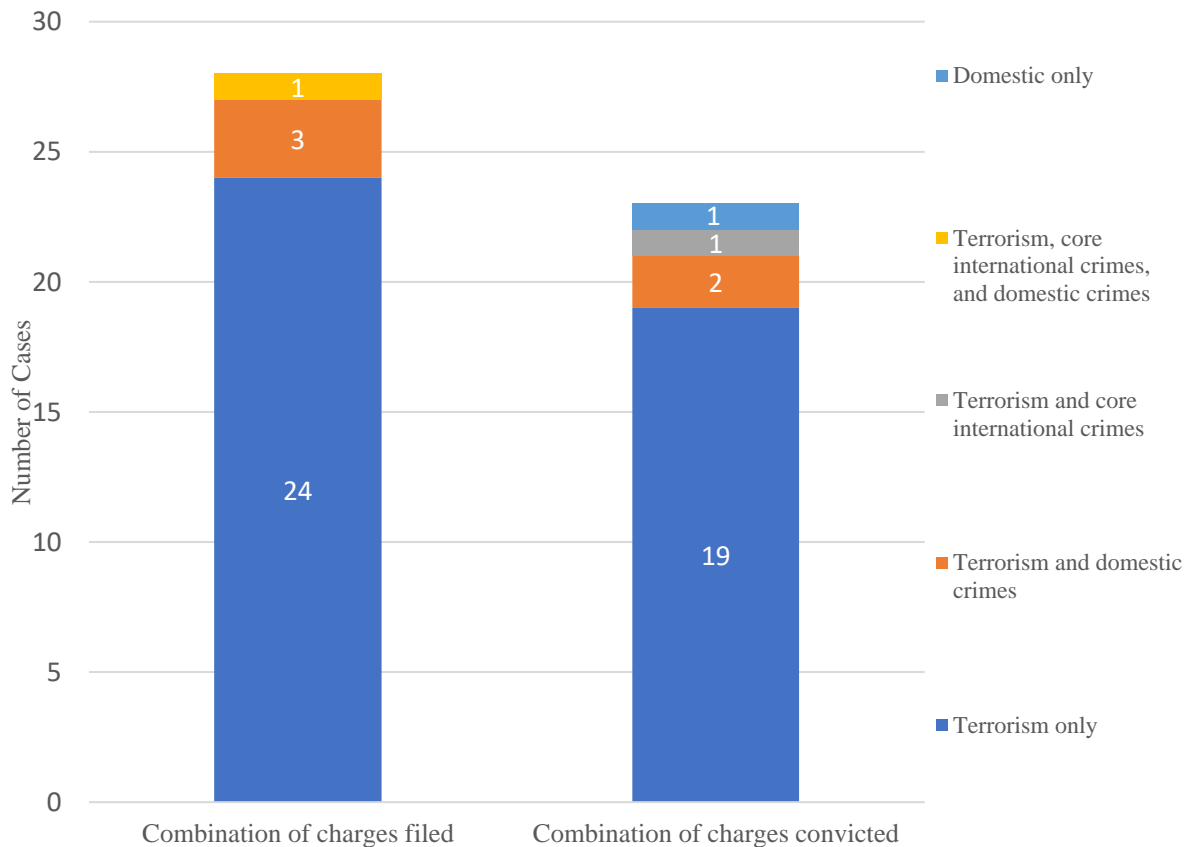


Figure 5.5: (Cumulative) indictments and convictions filed against female VEOs in the Netherlands (n=28; as of 15 July 2023)

Terrorist intent refers to the intent to instil fear among (part of) the population, or to force a country or international organisation to do or refrain from doing something or disrupt vital structures of a country or international organisation.¹⁷ Whether the acts resulted in fear or not is not relevant. It is decisive whether the perpetrator or terrorist organisation had the intention to instil fear. Thus, terrorist intent refers to the intended consequences.

Participation means belonging to the organisation with a terrorist intent and contributing in one or the other way to the aim of the organisation to commit terrorist acts. Participation could be by directly (co-)committing a crime, but also by providing non-criminal acts such as driving or arranging logistics, as long as it supports the terrorist objective of the organisation. To prove participation in a terrorist organisation, it is sufficient to establish that the individual was aware

that the organisation has a terrorist intent.¹⁸ It is not necessary that the individual was aware of any specific crimes the terrorist group intends to commit. Neither is it required to prove that the individual had the intent themselves because this is presumably included in the act of participation.¹⁹ Perhaps with the exception for the early months in 2014 before the establishment of the caliphate, courts considered that it was general knowledge that ISIS was an organisation with a terrorist intent.

In the case against Laura H. the court ruled that merely residing in ISIS territory would be insufficient to be considered as participation in a terrorist group. According to the court, citizenship does not automatically mean participation in a terrorist group.²⁰ This notion was not upheld in subsequent cases.

However, this issue remains a challenge when it comes to prosecuting women for participation in a terrorist group, as it is still often not clear what role women played during their time with ISIS.²¹ Several interview partners also indicated that returnees are very hesitant to share any information about their time under ISIS and what roles they have played. The female returnees are more open in sharing information about the detention conditions in the camps.

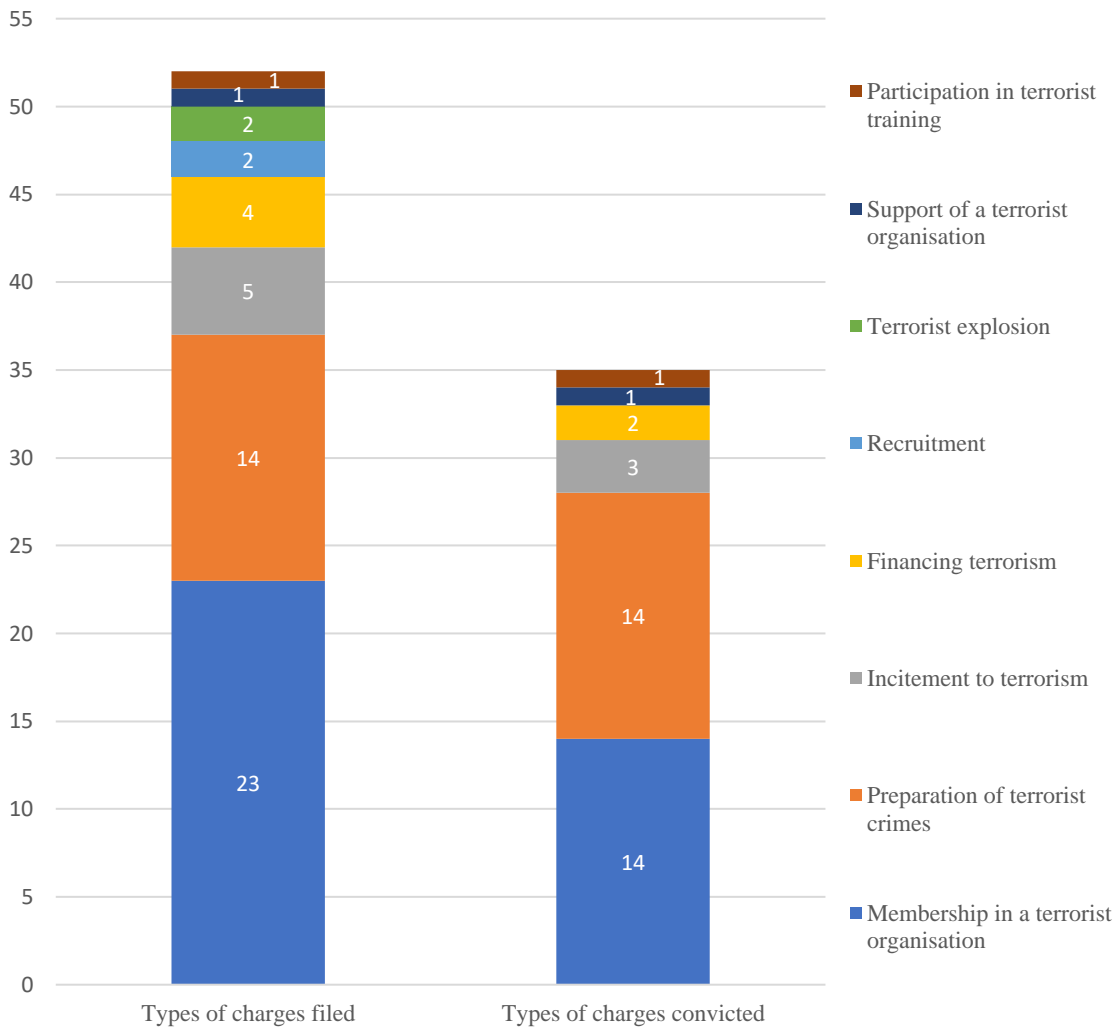


Figure 5.6: Terrorism charges filed and convicted in cases of female VEOs in the Netherlands (n=28; as of 15 July 2023)

When a woman is married to an ISIS fighter and runs the joint household, this is considered to constitute membership in a terrorist organisation. In total, three Dutch women were fully acquitted for participation in a terrorist group, while one case is pending appeal.²² In addition, two women were partially acquitted. This includes the case of Naima S. who travelled with her 15-year-old son to Syria to visit her daughter. According to the court, the mother had no intention to join ISIS, did not run a joint household, and was sick most of the time. She was acquitted for membership in a terrorist organisation but convicted for child neglect.²³ The prosecutor has appealed the verdict.

The women are often charged with ‘familiarising oneself with extremist ideology’ as one of the underlying facts to support the charge of preparation of a terrorist offence. In the cases against five women who have been repatriated, the court ruled there was insufficient proof that they adhered to extremist ideology, and they were consequently acquitted of this charge. While adhering to an ideology does not form a distinct element of the crime, it does play a role and is often mentioned as one of the underlying facts proving a terrorist offence. The Prosecutor has appealed all the five cases, so it remains to be seen what role extremist ideology will play in the final ruling.

Sentencing

The average length of sentence for female returnees and VEOs in the Netherlands is one year, seven months, and ten days.ⁱⁱⁱ The length of sentence refers to the duration of imprisonment that female VEOs are given in their verdicts, taking into account conditional parts of the sentence that are usually not enforced. However, the actual time that they have to spend in prison following their conviction is not necessarily the same as that which is pronounced in the verdict. The time spent in pre-trial detention is deducted so the actual time spent in prison becomes lower. Additionally, early releases after serving two thirds of the sentence could further shorten this period. As the Dutch dataset is very small, it is difficult to draw meaningful conclusions on the length of sentence, although it is clear that over time the women were receiving longer prison sentences.

Looking beyond the average length of sentence, one can see that the length of sentence has increased over time for different reasons. According to one interviewee, the first wave of women that travelled to Syria and Iraq, have mainly done so to join their husbands, whereas women who joined later were themselves (more) committed to the ISIS ideology. Additional information after the territorial defeat of the caliphate, also revealed the women have engaged in different activities including recruiting new members, providing training, and supporting terrorist activities. While the first female returnees who were sentenced between 2014 and 2017 received sentences of around eight months imprisonment, women convicted from 2018 onwards received higher sentences between thirteen months and six years imprisonment.

The maximum penalty for a terrorist offence under Dutch law is fifteen years imprisonment for membership in a terrorist organisation, although this sentence has rarely been given. Currently a bill is being prepared to raise the maximum penalty from fifteen to twenty years as this allegedly would better reflect the gravity of the crime.²⁴

To determine the length and type of sentence, the courts have taken many different factors into account. Mitigating factors include mental health issues, remorse, duration of the trial, strict

ⁱⁱⁱ Given the limited number of cases, individual cases such as the case of Imane B. who was sentenced to one week in prison in December 2015 significantly influence the overall average. Imane B.’s sentence was not enforced following the deduction of the days she had spent in pre-trial detention.

supervision during pre-trial detention, willingness to cooperate, age, and whether the convicts have children. Concerning aggravating factors, the lack of willingness to take responsibility for own acts, the duration of stay with ISIS, and the role they played within ISIS are crucial. In six cases, the courts considered the impact that a deprivation of nationality would have on the defendants as mitigating factor. In the case against Fatima H., her Dutch citizenship was revoked because she was deemed a risk to national security. At the age of seventeen, she went to Syria to join ISIS and contributed to propaganda activities. The deprivation of her citizenship means that she is no longer legally permitted to reside in the Netherlands after she has served her prison sentence. Despite the gravity of the crime and the duration of stay with ISIS, the court took into account that her children who have the Dutch nationality will be affected by this revocation.²⁵ Three out of the five women who were repatriated in February 2022 also risk being stripped of their nationality once the judgement becomes final. Considering the impact this has on their children, the court has taken this into account as a mitigating factor. In the case against the five women, the duration of stay and conditions in the al-Hol camp were also taken into account and lead to relatively short sentences. The verdicts of all five women have been appealed by the prosecutor. Finally, whether women are still adhering to extreme ideology is considered an aggravating or mitigating factor. How this assessment is made, will be discussed in the next section.

Since 2021 the execution of sentences has changed due to a new law called “punish and protect” which is also applicable to convicted female VEOs.²⁶ The most significant changes are that early release is no longer automatically granted when two thirds of the sentence have been served. Instead, the prosecutor will, on a case-by-case basis, determine whether a detainee can be released earlier from prison and under which conditions. However, if one’s nationality has been revoked, convicted female VEOs are not eligible for early release, because they are no longer legally entitled to be in the Netherlands. To make a proper assessment, the probation service, the prison management, victims or their family members, and the convicted person will be consulted. The behaviour of the convicted person, the risk of recidivism, and the impact on society are factors that are considered. Since the maximum period of early release has been reduced from ten to two years, prisoners who have been convicted for more serious offences and received longer sentences, will not be eligible for early release after serving two thirds of their sentence.

As part of the sentence, courts have ordered a broad range of probation measures for female returnees and VEOs. These can include measures relating to housing, finance, health but also to disengagement. These measures are mandatory, and some can commence in prison.

The Use of Administrative Measures

In the Netherlands, administrative measures can be imposed before, during or after a criminal conviction. Two measures have specifically been mentioned by the interviewees: the listing of a person on the national list of terrorism, and the deprivation of nationality.

National List of Terrorism

In practice, all persons who are known to have travelled to Syria and Iraq have been listed. With few exceptions in cases where there is no information available for those who travelled in early 2012. The purposes of listing and prosecuting individuals are different, although the underlying facts considered in the procedure can be the same.

One of the grounds to list someone is if there is sufficient indication that this person attempted, committed, or facilitated the commission of terrorist activities. According to the Sanctions Law, it is considered sufficient indication if an investigation has been opened, a prosecution has started, or a person has been convicted of terrorist offences. Furthermore, if the Dutch Intelligence Service provides an official notification that a person is about to, or is already involved in, committing terrorist activities, the decision can be taken to list the person. Most persons who are currently on the list are deemed to be abroad. By freezing assets, sanctions aim to reduce the chance a person would be able to commit a terrorist attack.

The Ministry of Foreign Affairs (MFA) chairs the inter-departmental consultation that determines whether a person should be listed or de-listed. Participating in this consultation are representatives from the prosecution office, intelligence agency, Ministry of Finance, financial intelligence unit, and the Ministry of Justice and Security. More recently, the prison facility also participates in this meeting.

Although the measure is a preventive one, its practical implications are very severe. The current sanctions regime in the Netherlands dates back to 1977 and has been updated to implement United Nations Security Council Resolution (UNSCR) 1373 (2001). Since the rise of ISIS, the freezing of assets as preventive administrative measures has been used more frequently to prevent the financing of terrorism. Not only are all assets of a listed person frozen, but nothing of monetary value can be given to the listed person. This includes everything such as clothing, training or even books. If a female VEO is still listed after release from prison they can face difficulties for example in securing housing or enrolling for educational programmes.

However, a person can be delisted. So far, all but one requests for delisting pertaining to female detainees have been granted. The overall duty of care, due diligence, and the impact which listing has on a person after serving their sentence are considered in deciding to delist a person. The request to be delisted can be filed by the person themselves or by their lawyer, by the municipality or the case manager in prison. If, as part of the request, the risk assessment is submitted, it will be taken into consideration together with other available information from the partners taking part in the consultation. The MFA can also decide to delist a person. The process of delisting can take between three to six months and may thus interfere with the release date from prison and the reintegration plan of a female detainee.

Deprivation of Nationality

The other administrative measure that is relevant in relation to female VEOs is the deprivation of nationality. The Dutch Immigration and Naturalisation Service (IND) is responsible for implementing and enforcing the revocation of Dutch nationality, yet it is a discretionary power of the Minister of Justice and Security. There are two ways in which nationality of dual citizens can be revoked in relation to terrorist offences. According to article 14 section 2 of the Dutch Nationality Act, a person can lose their Dutch nationality if they have been irrevocably convicted for a terrorist offence in the Netherlands.^{iv} The purpose of this measure is to reflect the fact that a person has broken the bond of solidarity and loyalty with the Kingdom of the Netherlands.²⁷ This measure can only be imposed if the verdict has become final and if it does not lead to statelessness. Subsequently, a person residing in Netherlands will become an alien.

^{iv} If someone is convicted for Article 134a Dutch Criminal Code, then citizenship can only be revoked after the criminal conviction has become final after 31 March 2016.

In case of an ongoing threat to national security, no residence right can be granted, and the IND will simultaneously issue a return decision and an entry ban to the Schengen area. This means the person has the obligation to leave the country. The decision is taken on the basis of available information based on the verdict, and input from the case management consultation lead by the municipality. The no entry ban can be issued for up to 20 years and only enters into force when a person has left the Schengen area.

The person will be heard before the decisions of deprivation of nationality and entry ban are taken. Both decisions can be appealed. Until an illegally residing person has left the country, the relevant authorities can also impose other administrative measures, such as a contact ban, area ban or duty to report to the police. The revocation of citizenship after a final conviction is in principle applied automatically, provided that the formal conditions are met. There is very limited discretion for the Minister or State Secretary of Justice and Security to decide not to revoke the Dutch nationality if the formal conditions are met. Only in very exceptional circumstances when a person is a minor, has serious (mental) health issues, is convicted with no or a very short sentence or has family members that are dependent on him or her can the Dutch nationality not be revoked. These exceptional circumstances have led to the decision not to revoke citizenship in six cases. Having children, a family life, and the impact that the revocation of the mother's citizenship has on children is not considered an exceptional reason to refrain from revoking the Dutch nationality but taken into account when deciding on the issuance of an entry ban. Out of the 29 revocation cases, nine have become final pursuant to article 14 section 2 of Dutch Nationality Act. One female has been expelled from Turkey after her Dutch nationality has been deprived.

The second way to revoke someone's nationality is when a person who is residing outside the Netherlands has joined a terrorist organisation that is considered a threat to national security under article 14 section 4 of the Dutch Nationality Act.²⁸ For the purpose of revoking nationality, persons who joined ISIS, al-Qaeda or Hay'at Tahrir al-Sham and affiliated organisations are considered to pose a threat to nationality security after 2017.²⁹ Simultaneously, with the revocation of Dutch nationality, the IND will also issue an exclusion order (*ongewenstverklaring*), which makes a stay in the Netherlands a criminal offence (article 197 Dutch Criminal Code) and the legal return to the Netherlands impossible. The decision of the revocation of the Dutch nationality can be appealed. There are limited grounds to refrain from revoking the Dutch nationality.³⁰ Out of 24 revocation cases pursuant to article 14 section 4 of the Dutch Nationality Act, four were successfully appealed in court. The Dutch Council of State has ruled in the case of Fatima H. that the interests of her children were not sufficiently considered in the decision to deprive her of her nationality, and subsequently overturned the revocation decision. Five decisions were withdrawn by the IND for procedural reasons and fifteen cases became final.

After a deprivation of nationality, the focus during detention should no longer be on reintegration in the Netherlands, but on reintegration in the country of the remaining nationality. According to the interviewees, this shift of focus should facilitate the return where possible. This could be facilitated by a transfer of the VEOs for the remainder of the sentence to a detention facility specialised for persons who are illegally in the Netherlands, provided that the security risks permit such a transfer. However, at the moment there is only one such facility in the Netherlands, only for men.³¹

Losing the Dutch nationality also means losing the national identity number which is needed for medical insurance, social services, housing, employment, or education. The consequences of losing the Dutch nationality and staying illegally in the Netherlands are severe, especially for those who have children, who remain Dutch even if their parents are deprived of their

nationality. In several cases, these women have never visited their country of other nationality. This complex situation causes distress and could severely impact a mother's ability to take care of their children. Mothers are unable to apply for medical insurance, register their children in school, arrange childcare or extracurricular activities. As a result, there is a risk that these women turn into illegality and return to a former or other violent extremist network.

After the deprivation of nationality and the return order has been issued, a person is no longer permitted to stay in the Netherlands. While some may voluntarily choose to leave the country, several others may not be willing or able to leave. Some may not have travel documents or there is a risk that their human rights might be violated, for example if the country of the remaining nationality is Afghanistan. If there is genuine risk that human rights will be violated, the Repatriation and Departure Service of the Ministry of Justice and Security will refrain from forcibly deporting the person to that country. Furthermore, the country of the remaining nationality may not always cooperate in taking back 'their citizens' by refusing to provide the necessary travel documents.

Several of the women who have been repatriated by the Dutch government in recent years have a double nationality, predominantly Moroccan, and are likely to lose their Dutch citizenship after their court decision has become final. As mentioned earlier, the risk of losing the Dutch nationality has been considered as a mitigating factor in several of the recent court cases. However, the prosecutor has appealed this verdict.

The Use of Ideological and Risk Assessments

Several tools are available to assess a person's violent extremism. Risk assessment is being used to determine whether the person would re-engage with violent extremism and investigates factors such as ideology and mental health. Different entities are involved in conducting ideological assessment and risk assessments for different purposes.

Ideological Assessment

The Dutch Probation Service is responsible for preparing 'Advise' - a report detailing the personal circumstances of the accused, the risk of recidivism including a risk assessment, ideological motivation of the individual, and advises on the recommended sentence and probation measures. The Terrorism, Extremism and Radicalisation (TER) team at the Probation Service consists of nineteen persons and is responsible for preparing these reports. The TER team is in touch with the accused throughout the criminal proceedings, starting with the arrest upon return and during the entire probation period. As a standard procedure, two members of the TER team are conducting interviews with the female returnees, starting by explaining the purpose of the meetings and the process. In most cases, female returnees are willing to cooperate to some extent. In some cases, the team specifically requests input from Nuance Through Training and Advice (Nuance door Training en Advies or NTA), a non-governmental organisation, to provide an ideological assessment.

The risk assessment by the Probation Service is being used by different actors for different purposes. It is being used during the trial to advise on the sentence and the type of probation measures, it is also being used within the prison context to determine which kind of security measures need to be in place. Finally, it can also be used once a woman is released from prison to monitor the probation measures that have been ordered by the court. In addition, whenever such measures need to be re-evaluated, a risk assessment will be conducted. A risk assessment

is valid up to one year and will then need to be conducted again. The Probation Service conducts a risk assessment by relying on two tools. The Risk and Advise Tool (RISc) is the more general tool that allows to determine the risk of recidivism divided in general and violent recidivism, based on a set of statistic and dynamic factors. This tool is used to prepare a report and is used in criminal proceedings, in particular when special probation measures end or need to be re-evaluated. This tool is not suited for VEOs as it does not address ideology. In addition to RISc, the TER also uses the Violent Extremist Risk Assessment 2 Revised (VERA-2R) to prepare their report which gives more insight into the risk of violent extremism.

Within the criminal justice process in the Netherlands, an ideological assessment can be ordered by the court at the request of the Prosecutor's Office. Understanding how a person acted or how they are ideologically motivated can be helpful to better understand the person's motives. However, it should be distinguished from terrorist intent, which refers to the intended consequences. Motivation on the other hand refers to personal drivers for why an individual has committed certain offences. These drivers can be ideological, economic, opportunistic, a sense of belonging or thrill seeking to name a few.³² Terrorist motive does not form an element of a terrorist offence but can help to understand the context in which a terrorist offence has been committed. It can also be considered as mitigating or aggravating factor. An ideological assessment can be part of the 'advice' that is being prepared by the Dutch Probation Service. In some cases, the ideological assessment is made together or by NTA.

NTA can also be requested by a court directly to provide an ideological assessment, in addition to the assessment conducted by the Probation Service. NTA conducts such an assessment based on the police file and a series of voluntary meetings with the suspect. So far, NTA indicated that women have participated and cooperated to a certain extent. The purpose of these meetings is first to assess whether a person is ideologically motivated and then to determine what this means: how have their religious concepts been formed, which sources do they rely on, and how does ideology determine their decisions and acts? NTA also provides advise, training, and ideological assessments for other Dutch stakeholders, such as municipalities, probation service, prison, police, and occasionally for defence counsel.^v

Mental Health

Finally, the prosecutor or the court can request the Netherlands Institute for Forensic Psychiatric and Psychology (NIFP) to prepare a report regarding the mental status of the suspect. Like the Probation Service, NIFP also relies on the VERA-2R evidence-based risk assessment instrument specifically designed to assess risks related to terrorism and violent extremism.³³ This so-called Pro Justitia report is prepared by a psychologist, psychiatrist, and case manager who look into the background of the accused. The Pro Justitia report does not determine whether someone is guilty or ideologically motivated but addresses the mental status of the accused. NIFP can conclude that a diminished mental capacity existed before, during, or after the crime. It is up to the court to decide whether it follows the findings made in the report, which could eventually lead to the conclusion that a person cannot be criminally responsible. In the case of Angela B., NIFP concluded that before her departure she suffered from mental health issues and as result could not be held responsible for any criminal act before departure. The court concluded she was guilty as charged of membership in a terrorist organisation and

^v The defence counsel does not directly request an ideological assessment but request the Prosecutor or the court for an ideological assessment.

preparation of terrorist offences but took her diminished mental capacity as a mitigating factor into account and sentenced her to a lower sentence than requested by the prosecutor.

As can be seen, several different ideological assessments are made during criminal proceedings. From the 28 cases involving female VEOs, in all cases, except for the acquittals, the Probation Service has provided an assessment. In sixteen cases, NIFP has prepared a Pro Justitia report and in five cases the Probation Service asked NTA to prepare an ideological assessment. The fact that women may have to participate in multiple assessments, including with the child protection services, can be upsetting for them. Without having access to the actual assessment, it is difficult to determine what the criteria are to request an assessment, and even more difficult to determine in how far the ideological assessment is used during sentencing.

A recent study on gender aspects of different ideological assessments in the Netherlands concluded that,

“[r]egarding the gender aspects, professionals indicate that women show different signals and ask for a different (overall) approach, whereas most instruments are developed on the basis of knowledge on men. As such, professionals point at the potential need for adjusted instruments and assessment procedures, and, relatedly, more training to deal with diverse groups.”³⁴

Recidivism

In relation to female VEOs, several factors are relevant to determine the risk of recidivism:

- Is the female returnee or VEO still part of a jihadi network?
- What was their role within the network?
- To what extent do they still adhere to extremist ideology?
- What is the status of the female VEO?
- How has their identity been formed and what is their level of self-esteem?³⁵

When the risk of recidivism is deemed to be high, it does not necessarily lead to higher sentences. The Probation Service rather recommends that the sentence should be executed directly and specific measures be imposed during the probation period. Siobhan W. travelled to Syria in 2015 where she joined ISIS and made contributions to the armed jihadi struggle. Back in the Netherlands, she was sentenced to 36 months in prison, of which twelve months included probation with a period of three years and special probation conditions. Her sentence was immediately executable. Although not claimed by defendant or raised by the Prosecutor, the woman was diagnosed with a personality disorder existent pre-crime, and post-traumatic stress disorder later on.³⁶ This shows how the risk assessment of the Probation Service is taken into account to determine the most suitable type of sentence.

The risk of recidivism is often discussed in the media, but research has shown that the risk of recidivism is exaggerated.³⁷ When talking about recidivism of female VEOs, a distinction should be drawn between terrorist offences and ordinary criminal offences that have been committed, and between violent and non-violent crimes. It is important to note that most of the female VEOs have been convicted for non-violent crimes. According to the data, it appears that only two women have been charged previously for a terrorist offence. In one case, the woman was acquitted for membership in a terrorist organisation prior to standing trial for financing of

terrorism and violating the sanctions law. The defence argued that she should not be prosecuted again as it violated the *ne bis in idem* principle (article 68 Dutch Criminal Code), which provides legal certainty and protects the accused from being prosecuted twice for the same facts. The court concluded that the second case against her related to a different set of facts and a different period of time and thus does not violate the *ne bis in idem* principle. Nevertheless, the woman was acquitted again due to a lack of evidence.³⁸ Considering that the woman was also acquitted of the previous charges, it is questionable whether this case constitutes recidivism and is a violation of the presumption of innocence - *res judicata* principle. In a recent study carried out in the Netherlands among the convicted male VEOs, 46 out of the 182 (25.3 percent) committed one or more criminal offences after release from prison. Only nine persons (five percent) committed a terrorist offence, mostly for participation in a terrorist group.³⁹ So far, data on female VEOs does not indicate that any of the women have a prior conviction for terrorism or have been involved in terrorist-related activities in prison or after release from prison.

After the women have served their prison sentence, several risk and protective factors have been identified that would contribute to female VEOs resisting radical networks. Having female VEOs transition through a regular prison, allows them to create new friendships with other female detainees not based on ideology, but shared interests. One of the risk factors is that because the women know each other for a long period of time and have gone through hardship abroad, they form a special bond. Additionally, deprivation of nationality has also been mentioned by interviewees as a reason to push the female VEOs to reach out to radical networks. The female returnees who have stayed with ISIS until the very end have a very high status in radical networks and are considered as very desirable members of these networks. After release from prison, some female VEOs may be susceptible to the status and be drawn back to radical networks.

Prison Management

In the Netherlands, convicted VEOs are separated from other convicted criminals. The main purpose for the concentration models is to prevent convicted VEOs from recruiting or radicalising other inmates, and from creating networks.

The current security measures that are imposed include:

- monitoring of supervised visits;
- video monitoring in the general areas;
- recording of phone calls;
- checking of incoming and outgoing mail; and
- screening of all contacts outside the prison.

In the summer of 2020, a terrorism unit specifically for women was created in the prison in Zwolle. It had the capacity to host a maximum of ten persons. After the District Court ruled that it would terminate the criminal proceedings against Ilham B., it became clear that the Dutch government would begin to more actively repatriate women. In December 2022, the Minister of Justice and Security, doubled the capacity of the unit.⁴⁰ As of June 2023, nineteen women are placed in Zwolle. Should capacity be exceeded, female VEOs can temporarily be placed in a terrorism unit of the prison in Vught. The decision is made on a case-by-case basis whilst ensuring that the reintegration process of the women is not severely impacted. Most of the women who are incarcerated in Zwolle have not received a final sentence, and are either in pre-trial arrest, or have an appeal pending.

The women can participate in minimum 36 hours of activities such as education, work, sport, religion, or other recreational activities. They can receive one visit per week and make a maximum of 40 minutes per week of phone calls with relatives or friends. In a regular prison, a total of 42.5 hours of activities are offered to detainees. The big difference between a regular prison and a terrorism prison is the level of supervision. Groups in terrorism facilities consist of maximum five persons and are supervised by two prison staff, whereas the ratio in a regular prison is 24:2. This intensive supervision allows to monitor the consistency in behaviour of female detainees.

During the creation of a separate unit for female VEOs, three women were detained in the prison in Vught, which is one of the two facilities for up to 60 male VEOs. This arrangement posed several challenges. First of all, physically separating men and women within one facility is complicated. What has, however, proven more difficult is that male VEOs were 'protective' of the female VEOs and for example did not tolerate male prison staff interacting with female VEOs. An advantage was that the female VEOs could receive more tailored support from dedicated staff. The training modules consist of sessions on group dynamics, pathways from radicalisation to detention, international developments regarding terrorism, Salafism, and practical tools on gathering information on ideology.

The strict detention regime has been criticised both internationally and nationally, and undergone several revisions over the years, although most of it in relation to the terrorism units at Vught and De Schie.⁴¹ One of the drawbacks of the concentration model is that new radical networks can be formed. Therefore, a differentiation model is being applied. In practice, this is less of an issue for women, as most of the female returnees already know each other from their period in the camps, or even before travelling to Syria and Iraq. Many of the female returnees have also maintained contact with their families while being in Syria and Iraq. The incarcerated female VEOs are a more homogenous group compared to the male VEOs. To prevent that strict adherence to radical ideology will persist or be imposed among the female detainees, differentiation within the concentration model is made between hardliners who are still committed to the ISIS ideology and others who distanced themselves from ISIS by placing them in different group activities. The strict security measures that are inherent to a terrorism unit are considered too severe and stigmatising for the women, while such strict security measures for men might even increase their status among detainees. Currently the terrorism unit in Zwolle is developing additional guidelines on which security measures should specifically be applied to female VEOs.

Once a woman arrives at the detention facility in Zwolle, information will be collected to assess the risk the woman poses (classification) and what security measures are needed (differentiation). This is done through observation by detention staff, and a risk assessment by the Probation Service with relevant information compiled by Detainee Criminal Investigation Information Point (GRIP), a specialised unit of the National Police. Once all information is compiled, it will be used to determine which level of security measures are needed but also to prepare an individualised reintegration plan. In less than half of the cases, a complete risk assessment is unavailable due to lack of information.⁴² In these cases, the Probation Service provides a written report. The risk assessment based on the VERA-2R tool is repeated after one year, and the risk is considered to be higher, not because the woman poses a bigger risk but because more information has become available. The information that is often lacking relates to the commitment to ideology, and their role and activities during their stay in Syria or Iraq. When the risk assessment is made a year later, a more complete assessment can be made based on ideological assessment, but in particular through observations by prison staff. This

allows to make a better assessment of the convicted female VEOs and adjust or modify the security measures and the individualised reintegration plan.

As around two-thirds of the incarcerated women have children, one of the challenges remains how to ensure that the mothers can maintain a relationship with their children. In addition to one weekly visit, every six weeks children can spend time with their mother in a special child-friendly room. In practice, it is not always possible to facilitate these visits due to practical and logistic challenges which causes frustration among the mothers.

Each detainee is assigned a case manager who is in charge of developing an individualised reintegration plan. The five areas of focus are: work and income; housing; finance; identity papers; and health insurance. Every six weeks, a multidisciplinary meeting – multidisciplinary resocialisation coordination meeting (MAR) – takes place. It is being led by a staff member of the programme to tackle radicalisation and extremism (PARE, a programme that belongs to the Prison Services but is not connected to a specific prison facility). Several prison staff participate in the MARs. Other parties include the Probation Service, the case manager, and the municipality with the aim to monitor and adjust where needed the individual reintegration plan and assisting with developing a network. The MAR meetings have helped to identify potential divergent versions or perceptions of the female VEO and detect possible false compliance.

Under the Punish and Protect Law, detained VEOs who have been stripped of their nationality are now foreigners who are no longer legally in the Netherlands. Those who are willing to leave to the country of other nationality can request a suspension of their sentence. The suspension will only enter into force when a person has left the Netherlands and is only available for detainees that have been sentenced for three years or more and have already served half the sentence. The country of the other nationality must be willing to cooperate in the return of the individual and if needed, issue a travel document. An individual's request for suspension will be refused if there is a genuine risk that the human rights of the detainee would be violated in the country of the other nationality, or if other criminal investigations are still on-going. This is relatively new measure and so far, it has not yet been applied to female VEOs.⁴³

Once a convicted VEO has completed one-third of their sentence, they can be transferred to regular prison for a period between four months and one year, which contributes to a smoother reintegration into society. For example, they could apply for reintegration leave for a job interview. In practice, after reduction of pre-trial detention, the remainder of the sentence is so short, that in most cases the female VEOs will be released from terrorism unit straight into society, without transitioning through the regular prison. Female VEOs can be monitored and observed in regular prisons for how they manage in a prison setting with less supervision and less strict security measures. The regular prison also offers more opportunities and support to reintegrate into society. When the female inmates are released into society without serving the last part of the sentence in a regular prison unit, it could increase the risk to recidivism. However, this has not happened in practice. So far, six female VEOs have been released and only two of them have transitioned through regular prison.

False Compliance or Strategic Opportunism?

The issue of false or disguised compliance has been raised in many interviews conducted by the author. Considering that the Netherlands uses the concentration model in prison, the question is whether false compliance is more likely to occur as female convicts could more easily share ideas on how to manipulate the system. Several of the interviewees indicated that there is no actual proof of false compliance, in the sense that women were deliberately able to

manipulate the outcome of (risk) assessments and the course of the proceedings. Practically all women who stand trial indicate they were merely housewives and had no major role in ISIS. In particular, when the women are awaiting trial or in the period until the judgment becomes final, they may withhold certain information and are very keen to demonstrate they have adopted a ‘modern’ approach to life. Overall, the women do not share much information about their time with ISIS, or about the role or activities of their husbands. The women are well aware of the different steps within the criminal proceedings and share tips and tricks among each other. Until the judgement is final, the women remain reserved even in detention. This makes it difficult to get a better understanding of their role during their time with ISIS but can also be difficult in determining which kind of individual reintegration plan is suitable. However, interviewees indicated that the different multidisciplinary consultations are helpful to identify any possible cases of false compliance.

Rehabilitation and Reintegration

The process of rehabilitation and reintegration (R&R) in the Netherlands starts in prison and is continued upon release. The Dutch R&R approach can be characterised as a comprehensive, tailor-made, multi-agency approach, and one that is focused on disengagement.

During the sentencing, different rehabilitation and reintegration measures are imposed on the women as can be seen from the graph below. Participation in these rehabilitation measures is thus mandatory. In deciding on these mandatory measures, judges can order a convict to follow more than one measure. Hence, the 28 female convicts captured in the dataset were ordered to a total of 74 measures from ten different categories (Figure 5.7). It can be seen that the most commonly court ordered rehabilitation and disengagement measure (nineteen percent) is the reporting duty to the Probation Service which fourteen of the 28 women had to follow. Equally many women had to follow regulations on their living arrangements, and psychosocial counselling, either in addition to each other or in combination with other measures. Contact restraints which amount to fifteen percent of all ordered measures have been ordered in the cases of eleven women. Fulfilling mandatory social services was only ordered in one case and thus presents the least frequently court-ordered rehabilitation and disengagement measure in the cases of female VEOs, presenting one percent of all such measures as shown in Figure 5.7. The Dutch Probation Service is responsible for monitoring the special measures that have been imposed by the court during and after detention. The challenge with compulsory rehabilitation measures is that it is difficult to determine whether the women are intrinsically motivated to participate in these measures.

Already prior to release from prison, the municipality where a female returnee resided before she travelled to Syria or Iraq will be notified. This allows the municipality to be involved at an early stage. Every person that is discussed in a case management meeting needs to be notified. Some of the municipalities, such as The Hague and Zoetermeer choose to inform the women in person (in prison) of this decision and create an opportunity to build trust. Several municipalities actively stay in touch with the family of the women that have left for Syria or Iraq. This contact establishes trust and helps to manage expectations. It also makes it easier to reach out to the female relative once they have returned or were repatriated.

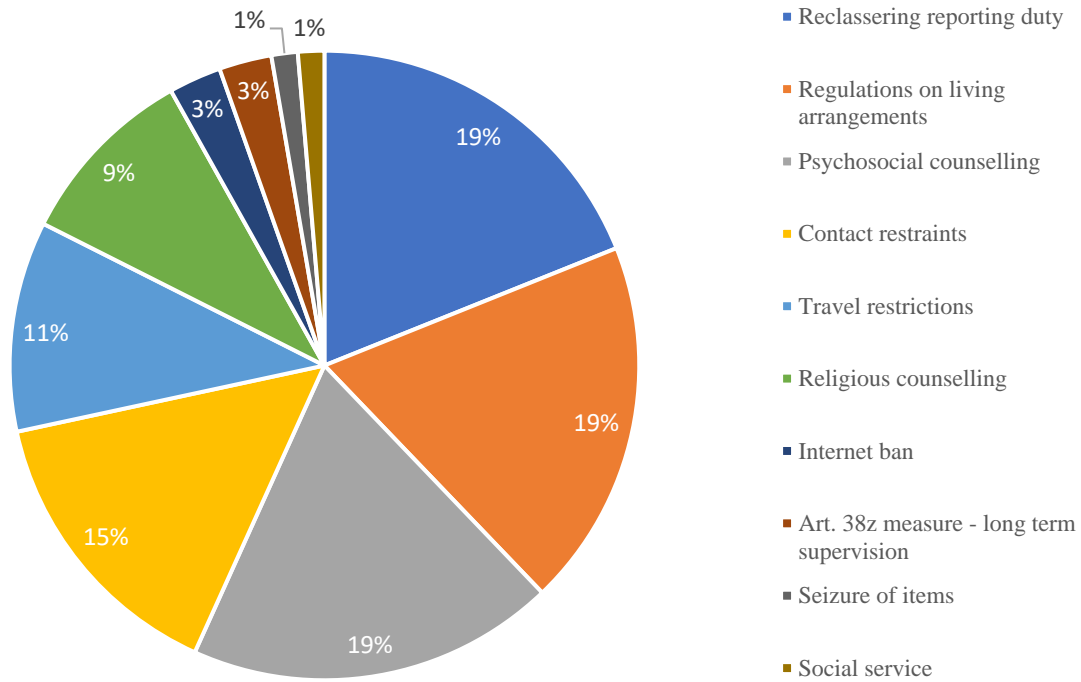


Figure 5.7: Types of court ordered rehabilitation/disengagement activities for female VEOs prosecuted in the Netherlands (n=74 measures; as of 15 July 2013)

Case management consultations can take place simultaneously when the MAR meetings are taking place. The MAR meetings are perceived more in depth but happen during the period that a person is detained, whereas the case management consultations can already start when a person has travelled to Syria or Iraq and continues after a person has been released from prison. Another notable difference is that the police is only present at case management consultations to provide information.

Some municipalities, such as The Hague, have developed their own return plan, a practical guide that can assist local authorities and other partners indicating which steps have to be taken by whom. It also includes a communication strategy. No distinction is made between male or female returnees.

As mentioned earlier, the focus of reintegration is achieving five 'basic conditions for reintegration', namely: a valid ID; housing; a job or other day activity; income; and (the continuation of) appropriate care. The underlying reason is that by having those basic conditions in place, it would reduce the likelihood of recidivism but also reduce the chances that released female VEOs would (re)join a jihadi network.

The essential goal of the rehabilitation and reintegration process is disengagement, which targets behaviour, as opposed to de-radicalisation process, which targets an inmate's beliefs. Disengagement is considered a more realistic goal in that it simply requires an inmate to stop radical behaviour, without having to have a complete renouncement of or delve too deeply into their core values and beliefs.

Many municipalities and interviewees have indicated that deprivation of nationality, or the risk of deprivation of nationality, and in particular the consequence of this measure, is not considered conducive for the reintegration. The four big municipalities (Amsterdam, Rotterdam, Utrecht, and The Hague) have shared several objections in particular regarding the

input of the case management consultations requested by the IND in the decision to deprive the Dutch nationality after criminal conviction. These four municipalities indicated that they are not equipped to make a risk and security assessment after a person has been deprived of their Dutch nationality.⁴⁴ The Probation Service has also shared several objections. Because of the consequences of deprivation of the Dutch nationality, the Dutch Probation Service says it is unable to perform its tasks of providing supervision and assisting with reintegration into Dutch society. This is the reason why the Dutch Probation Service requests to be discharged of its legal tasks because they cannot be executed through them.⁴⁵ The majority of the female returnees are from the region around The Hague and have double nationality.^{vi}

The multi-agency case management consultation that took place during detention, the MAR meetings, is now being continued at local level under the Safety House model established in 2013. The Safety House model can be used not only for dealing with the reintegration of VEOs, persons who are vulnerable for radicalisation, but also domestic violence, child abuse and disturbed person who pose a security risk.⁴⁶ Several of the stakeholders that were involved in the MAR meetings, such as Dutch Custodial Service, are also involved in the individual case management consultation led by the municipality. Participants of the case management consultation include the Public Prosecutor's Office, police, probation service, but could also include mental health or youth care workers, or child protection board. Not all municipalities have adopted an approach to address radicalisation and case management consultations.⁴⁷ While some municipalities have had a relatively large number of citizens depart for Syria and Iraq or even had experience with radicalisation prior to the rise of ISIS, there are differences between bigger, medium, and smaller municipalities. The way municipalities implement the case management consultations also differs.

A combination of interventions can be implemented, combining security and care. These may consist of legal and administrative measures such as travel ban, an area ban, a restraining order, or a reporting obligation, as well as more 'support orientated' measures such as family support, ideological and psychological counselling, practical support with housing and a job, help in breaking contact with the former extremist network, a social media ban, and involvement of child protection services to protect the best interest of the child. Municipalities can offer additional support in housing, debt management, and welfare applications under the condition that the former female detainee cooperates in the disengagement process.

In general, women return to the municipality where they were registered prior to travelling to Syria and Iraq or the conviction of a terrorist offence. Most of the female returnees have children, and upon return to the Netherlands they will be separated from them. After a period of six months of observation, the children can be placed in foster family or with the extended family. Some female convicts indicated that after release from prison they would like to return to the municipality where their children are located.

After release from prison, a social case manager will assist with the reintegration of the female VEOs together with Probation Service. The social case manager can assist with work, schooling, housing and assist with financial support. The big difference is that the R&R in prison can be mandatory and is fully being funded by the Ministry of Justice and Security, whereas the R&R upon release is voluntary and is no longer funded through the prison authorities. The reintegration after prison is funded by the municipalities. While participation in R&R programmes is considered more successful if the detainee is actively participating and committed, some of the R&R components can be mandatory and are imposed by the sentence.

^{vi} Only a limited number of interviews were conducted with municipalities and therefore we are unable to confirm regarding double nationality in other municipalities.

Each municipality offers their own rehabilitation and reintegration programme. One of the interviewees indicated that the main distinguishing factor between men and women is having children. During the post-prison period, the municipality can assist former female detainees with childcare support while they are working or taking classes. In addition to their own reintegration programmes, women also have to engage with several child protection agencies and possibly family courts adding another set of actors with whom they need to interact.

One of the challenges in rehabilitation and reintegration of female VEOs is sharing information among the different stakeholders that are participating in the case management under the Safety House model, given the strict privacy rules. To facilitate information sharing and clarifying the roles and responsibilities between the different stakeholders, a non-binding covenant was adopted to provide guidance on what kind of information can be shared. Currently, a bill has been prepared that provides a legal basis for the existing practice of case management consultations and thus also for the exchange of information.⁴⁸

From research conducted among mainly male VEOs released from prison, it was clear that most of the male VEOs are struggling with housing, jobs, and income, but not significantly more than regular male detainees. While the rate of recidivism for terrorist offences is low, there is a risk of (re)engaging with a jihadi network in particular when the basic conditions for reintegration are not met, and when there is a lack of healthy support network of family and friends.⁴⁹

One of the issues that could arise is that female VEOs are unable or unaware that they need to obtain a Statement of Good Behaviour (SGB) for certain jobs because of their conviction for terrorist offences. Some of the female VEOs in prison would like to become a teacher or a youth worker for which a SGB is required. One convicted female returnee was able to obtain a SGB and worked as volunteer for a refugee organisation with vulnerable persons and had access to sensitive information. This led to a discussion whether the procedure of acquiring a SGB sufficiently considers the risks to society. The purpose of the screening is to determine whether the criminal past forms an obstacle to perform a certain function. The screening should take the interest of the individual and the risks to society into account. As a result of this discussion, the policy to obtain a SGB for former convicts of terrorist offences is going to be tightened. One of the proposed measures is to increase the period of maintaining the status of having a criminal past from four to twenty years for certain jobs.⁵⁰

So far, not enough female VEOs have been released from prison, to assess whether their reintegration and disengagement into society is successful under the given frameworks. Several interviewees indicated that they do not expect that many of the female VEOs to commit (violent) terrorist offences, but some are more likely to reconnect with the jihadi scene, in particular when there is no supervision, or when monitoring has ended.

Challenges and Conclusions

So far, 28 women have been prosecuted and twelve are awaiting trial. The prosecutorial strategy has evolved over the years and women are now more frequently being charged for the full range of crimes that they have committed, which include domestic offences such as child neglect and core international crimes. A range of mitigating and aggravating factors are taken into account during sentencing, but no consistency among the courts can be seen. The use of multiple risk and ideological assessments and how they are considered during sentencing is unclear. It can be overwhelming for the women to participate in several such assessments.

While some significant steps have been taken to expedite the delisting of women from the national terrorism list, not all stakeholders involved are aware of the process. Transparency about these procedures could be improved. The vast majority of interviewees have serious concerns regarding the implementation and impact of deprivation of the Dutch nationality and do not consider it conducive for the reintegration of these women into society. There are tensions between the different stakeholders on the use of this particular measure.

In the prison context, one of the key challenges is that many of the women are no longer able to transition from a terrorism unit to a regular unit, which is considered beneficial for the reintegration of women into society. Other challenges include strict security measures. Considering that most of the women were not involved in violent terrorist activities, the risk that they would engage in violent terrorist activities is considered relatively low. It can be questioned whether such strict measures are indeed needed.

The information sharing process in the case management consultations as part of the Dutch R&R approach has been legally formalised and information sharing has been improved. Not all municipalities have the same capacity to deal with released female VEOs, and as a result there might be differences from one municipality to the other. So far, too few women have been released to draw any conclusions regarding the success of the rehabilitation and reintegration efforts.

Currently, none of the women were convicted for terrorist offences prior to their latest conviction, indicating that they do not have a history in terrorism-related activities. Looking at the dataset, most women engaged in non-violent terrorist activities such as recruitment, incitement, and propaganda activities.

This does not mean that women pose no risk after release from prison. Depending on their role and the status they had within ISIS, some women could still be ideologically motivated and (re-)join a radical network after release from prison. In particular, when women have gained expertise in weapons and training, they can spread this knowledge to others. The individual risk and protective factors are also important in determining whether a woman would re-engage with a radical network or other terrorist activities.

Case Study: Yousra L.

Yousra L., a widow of an ISIS fighter, was arrested in October 2019. She was suspected of being one of the hosts of different ISIS groups on Telegram, most prominently a group called *GreenBirds*. This group was used as an un-official media channel by ISIS, like many other groups on Telegram, and aimed at spreading ISIS ideology and making calls to armed or financial jihad. The size of these groups varied from 28 participants to as many as 190 participants. Yousra L. was later found to be the administrator of most of these groups and was otherwise a member.

During an investigation into the Telegram activities of another suspect, the authorities became aware of the activities of Yousra L. which led to opening investigations against her. Yousra L. was initially charged with membership in a terrorist organisation, incitement of terrorist offences, and financing of terrorism. The investigation revealed that Yousra L. had also distributed videos of victims being beheaded, murdered, or even burned alive. While sometimes she just further distributed the videos, she had also, in some instances, added her own dehumanising and humiliating comments. Among others, she called the burning victims “roasted chickens” which led the authorities to add the war crime of outrage upon personal dignity to the indictment of Yousra L.

On the 29 June 2021, the District Court in The Hague found Yousra L. guilty of all counts and sentenced her to six years imprisonment (minus the 32 months of pre-trial detention) and compulsory psychiatric treatment because she suffered from a mental disorder at the time she committed the offences. This verdict is unique for several reasons.

Firstly, in this case, the court concluded for the first time that, under Dutch law, ISIS is not only a terrorist organisation, but also a criminal organisation with the intent to commit war crimes and other core international crimes. In order to prove this the court had to establish a number of facts. First, it found that ISIS is a criminal organisation within the meaning of article 140 of the Dutch Criminal Code, as confirmed in previous case law. Second, based on its own case law, the court reiterated that ISIS intended to commit terrorist crimes, and that there was a non-international armed conflict between ISIS and the armed forces of Iraq and Syria. Third, concluding that ISIS intended to commit war crimes, the court established that ISIS had the intention to kill persons protected under IHL. In fact, the evidence showed that large scale executions and beheadings of civilians and persons *hors de combat* are part of the group’s modus operandi. Moreover, the public display of the bodies of the victims and lack of burial was considered as a violation of the personal dignity of the deceased. The online distribution of videos depicting these activities further contributes to said violation.

Secondly, the verdict was unique as Yousra L. was the first person convicted for committing a war crime in relation to ISIS activities in Iraq from within the territory of the Netherlands. As she was not herself present in the conflict zone, the court had to carefully consider whether her actions could be considered a war crime. The court concluded that the distribution of these videos, especially in Telegram channels whose purpose was to distribute jihadist material which glorifies ISIS, shows support for the atrocities committed by ISIS, regardless of whether she added comments to it or not. In addition, for a successful war crimes conviction, a nexus between the conduct of Yousra L. and the armed conflict needed to be established. Hence, the court turned to the jurisprudence of international tribunals which previously established that for conduct to qualify as a war crime, it does not need to

have taken place in the course of the fighting or within the area of combat, as long as the crimes are closely related to the hostilities. The court ruled that Yousra L.'s display of prisoners and deceased persons in a degrading manner contributed to an outrage upon the personal dignity of detained persons. Thus, in sharing the videos on Telegram, she acted in line with the media strategy of ISIS as a '*media mujahedin*.' This formed the nexus between Yousra L. and the armed conflict in Syria and Iraq.

Lastly, and perhaps most importantly, Yousra L. was the first female in the Netherlands to be charged and convicted cumulatively, for terrorism offences and core international crimes. While this case is still pending on appeal, the verdict demonstrates that prosecuting women beyond terrorist offence is feasible and could be pursued where appropriate in the future. Several women who were repatriated to the Netherlands in late 2022 are also facing allegations of both terrorism and core international crimes.

Source: Case 09/748012-19; 09/748012-19-P, Yousra L., District Court The Hague, Judgment, 29 June 2021, <https://uitspraken.rechtspraak.nl/details?id=ECLI:NL:RBDHA:2021:6620&showbutton=true&keyword=09%252f748012-19%253b%2B09%252f748012-19-P&idx=2%20%20https:%2F%2Fuitspraken.rechtspraak.nl%2F>.

¹ Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, “Uitreizigers en terugkeerders. Hoeveel Nederlanders zijn uitgereisd en bevinden zich nog in the regio?”,

<https://www.aivd.nl/onderwerpen/terrorisme/uitreizigers-en-terugkeerders>

² Ibid.

³ Ministerie van Justitie en Veiligheid, “Dreigingsbeeld Terrorisme Nederland 58, (30 May, 2023), p. 19.

<https://www.nctv.nl/themas/contraterrorisme/documenten/publicaties/2023/05/30/dreigingsbeeld-terrorisme-nederland-58>; For more information on gender-specific aspects of female travellers and returnees in the Dutch context, see Foreign Terrorist Fighters Knowledge Hub, Netherlands country page:

<https://www.foreignterroristfighters.info/country/nl>.

⁴ Thomas Renard and Rik Coolsaet, “Returnees: who are they, why are they (not) coming back and how should we deal with them?”, *Egmont Paper 101*, February 2018 (Brussels: Egmont Institute), p. 4.

https://www.egmontinstitute.be/app/uploads/2018/02/egmont.papers.101_online_v1-3.pdf.

⁵ Case 83/165263-20, 83/058851-22 and 83/058827-22, Judgment (First Instance), District Court of Rotterdam, 31 August

2021. <https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBROT:2022:7335&showbutton=true&keyword=financier%2Bterrorisme&idx=1>.

⁶ If the nationality has been revoked of these women under article 14 section 2 of the Dutch Nationality Act, the entry ban – which is imposed together the deprivation of nationality -can be temporarily be suspended to allow the women to stand trial in the Netherlands. See Rijksoverheid, “Kamerbrief met 4e rapportage uitreizigers,” 15 May 2023. <https://www.rijksoverheid.nl/documenten/kamerstukken/2023/05/15/tk-vierde-rapportage-uitreizigers>.

⁷ Netherlands Public Prosecution Service, “National Office,”

<https://www.prosecutionservice.nl/organisation/national-office>.

⁸ Furthermore, the prosecutor can also decide not to prosecute for technical reasons, such as lack of evidence, if no criminal offence has been committed or if the suspect has wrongly been identified as perpetrator. Openbaar Ministerie, “Aanwijzing spot en gebruik sepotgronden,” *Staatscourant van het Koninkrijk der Nederlanden* 62570, 31 December, 2020. <https://zoek.officielebekendmakingen.nl/stcrt-2020-62570.html>.

⁹ Algemene Inlichtingen- en Veiligheidsdienst, “Leven by ISIS, de mythe ontrafeld,” Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, 12 January 2016,

<https://www.aivd.nl/documenten/publicaties/2016/01/12/aivd-publicatie-leven-bij-isis-de-mythe-ontrafeld>.

¹⁰ Renard and Coolsaet, “Returnees: who are they, why are they (not) coming back and how should we deal with them?” p. 62.

¹¹ See also, Openbaar Ministerie, “Strafeisen van 3,5 tot 4 jaar voor vrouwen verdacht van deelname aan IS,” Nieuwsbericht, 16 March 2023, available at <https://www.om.nl/actueel/nieuws/2023/03/16/strafeisen-van-35-tot-4-jaar-voor-vrouwen-verdacht-van-deelname-aan-is>.

¹² Landelijk Parket, “OM pakt IS-terugkeerders met een missie aan.” YouTube video, 2:31. February 15, 2017. <https://www.youtube.com/watch?v=vF0dBpZTK28>.

¹³ Tanya Mehra, “The Repatriation of Five Women and Eleven Children from Syria: A Turning Point in the Netherlands?” Perspective, International Centre for Counter-Terrorism, 11 February 2022.

<https://www.icct.nl/publication/repatriation-five-women-and-eleven-children-syria-turning-point-netherlands>.

¹⁴ Case 71/148283-21, *Ilham B.*, District Court Rotterdam, Judgment, 1 June 2022.

<https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBROT:2022:4257&showbutton=true&keyword=71%252f148283-21&idx=1>.

¹⁵ See Case *Context*, District Court The Hague, Judgment, 10 December 2015, ¶ 7.38-7.40.

<https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBDHA:2015:14365>.

¹⁶ Case 09/748012-19; 09/748012-19-P, *Yoursa L.*, District Court The Hague, Judgment, 29 June 2021.

<https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBDHA:2021:6620&showbutton=true&keyword=09%252f748012-19%253b%2B09%252f748012-19-P&idx=2%20%20https:%2F%2Fuitspraken.rechtspraak.nl%2F>.

¹⁷ See Article 83a2, Wetboek van Strafrecht [Criminal Code of the Netherlands].

<https://wetten.overheid.nl/BWBR0001854/2018-07-01/0/BoekEerste/TiteldeelIX/Artikel83a/afdrukken>.

¹⁸ See Case 21/01122, Supreme Court of the Netherlands, Judgment, 1 November 2022, ¶28.

<https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:PHR:2022:1014>.

¹⁹ Case 21/01312, Supreme Court of The Netherlands, Judgment, 5 July 2022.

<https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:HR:2022:970>.

²⁰ Case 10/960288-16, *Laura H.*, District Court Rotterdam, Judgment, 13 November 2017.

<https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBROT:2017:8858>.

- ²¹ Case 10/960091-16, District Court Rotterdam, Judgment, 19 March 2020. <https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBROT:2020:2546&showbutton=true&keyword=poging%2Btot%2Breizen,terrorisme&idx=30>.
- ²² Case 10/960091-16, *Ibid.*; Case 03/721031-16; 03/702658-17, District Court Limburg, Judgment, 19 December 2017, <https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBLIM:2017:12404&showbutton=true&keyword=03%252f721031-16%253b%2B03%252f702658-17&idx=1>; Case 71/028979-22, *Naima S.*, District Court Rotterdam, Judgment, 13 April 2023. <https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBROT:2023:3081&showbutton=true&keyword=&idx=2>.
- ²³ Case 71/028979-22, *Naima S.*, *Ibid.*
- ²⁴ Rijksoverheid, “Ministerraad stemt in met hoger strafmaximum voor deelbeming aan een terroristische organisatie,” Nieuwsbericht, 27 October 2023. <https://www.rijksoverheid.nl/actueel/nieuws/2023/10/27/ministerraad-stemt-in-met-hoger-strafmaximum-voor-deelneming-aan-een-terroristische-organisatie#:~:text=Op%20dit%20moment%20geldt%20een,circa%20tweintig%20jaar%20hebben%20voorgedaan.>
- ²⁵ Case 10/960104-16, *Fatima H.*, District Court Rotterdam, Judgment, 12 April 2021. <https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBROT:2021:3131>.
- ²⁶ Ministerie van Justitie en Veiligheid, “Wet straffen en beschermen,” 2021. <https://www.dji.nl/justitiabelen/volwassenen-in-detentie/wet-straffen-en-beschermen>.
- ²⁷ Ruth Kats, Beatrice de Graaf and Pauline Jacobs, “Terroristen in detentie. Een overzicht van de ontwikkeling en discussie over de terroristenafdelingen in Nederland, 2004-2022,” in *Terugkeer en re-integratie van ex-Syriegangers*, Ministerie van Justitie en Veiligheid, November 2022, p. 4. https://repository.wodc.nl/bitstream/handle/20.500.12832/3219/JV202203_volledige-tekst.pdf?sequence=1&isAllowed=y.
- ²⁸ Rijkswet op het Nederlanderschap [Dutch Nationality Act], <https://wetten.overheid.nl/BWBR0003738/2022-04-01>.
- ²⁹ Ministerie van Veiligheid en Justitie, “Besluit van de Minister van Veiligheid en Justitie van 2 maart 2017, nr. 2050307, tot vaststelling van de lijst met organisaties die een bedreiging vormen voor de nationale veiligheid,” *Staatscourant van het Koninkrijk der Nederlanden* 13023, 10 March 2017. <https://zoek.officielebekendmakingen.nl/stcrt-2017-13023.html>.
- ³⁰ See Article 68c, Besluit verkrijging en verlies Nederlanderschap [Decision on acquisition and loss of Dutch citizenship], <https://wetten.overheid.nl/BWBR0013605/2017-03-01>. In reaching a decision to revoke nationality, the Minister should take into the account the proportionality of the decision, the impact it can have on investigations and criminal proceedings. Furthermore, if the revocation decision and subsequent return decision would violate the right to a private and family life, this is too would be a ground not to revoke the Dutch nationality.
- ³¹ Ministerie van Justitie en Veiligheid, “Penitentiaire Inrichting Ter Apel,” Dienst Justitiele Inrichtingen. <https://www.dji.nl/locaties/t/pi-ter-apel>.
- ³² “Daarbij staat voorop, dat het terroristisch oogmerk niet hetzelfde is als iemands ideologische of religieuze motief, hoewel dit motief wel een rol kan spelen in het bewijs van het terroristisch oogmerk. Het gaat er met name om welk effect de verdachte met een gedraging wilde bereiken en dus niet om de vraag waarom de daad wordt gepleegd.” Case 16/659055-19, District Court Midden-Nederland, Judgment, 20 March 2020, sub-heading 5.3.1.3. https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBMNE:2020:1046&showbutton=true&keyword=terroris*%2Boogmerk%2Bmotief%2Bduiding&idx=1.
- ³³ Ministerie van Justitie en Veiligheid, “Violent Extremism Risk Assessment 2 Revised,” Dienst Justitiele Inrichtingen. <https://www.vera-2r.nl>.
- ³⁴ Charlie Stoeldraaijers, Elaine Rodermond, Tasniem Anwar, Nadia Ismaili and Rik Peels, “Een onderzoek naar de totstandkoming en kwaliteit van, het toezicht op, en beroepsmogelijkheden tegen ideologische duidingen,” Eindrapport, Wetenschappelijk Onderzoek- en Documentatiecentrum, 2023, p. 148. <https://repository.wodc.nl/bitstream/handle/20.500.12832/3279/3292-ideologische-duidingen-volledige-tekst.pdf?sequence=1&isAllowed=y>.
- ³⁵ Gaby Thijssen and Jelle Sijtsema, with Stefan Bogaerts, Lys van de Voorde, and Erik Masthoff, “Radicalization processes and transitional phases in female and male detainees residing in Dutch terrorism wings” *Behavioral Sciences* 13(10), October 2023, pp. 3-5, 17-20, <https://www.mdpi.com/2076-328X/13/10/877>.

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- ³⁶ Case 10/960252-16, *Siobhan W.*, District Court Rotterdam, Judgment, 19 August 2021. <https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBROT:2021:8157&showbutton=true>.
- ³⁷ Elaine Rodermond, Romi Zalmé and Esther Zuiderveld, “Re-integratie en recidive na een verblijf op de TA,” Nederlands Studiecentrum Criminaliteit en Rechtshandhaving, 2021. https://nscr.nl/app/uploads/2021/10/Rapport-Re-integratie-en-Recidive-na-TA_271021.pdf; Thomas Renard, “Overblown: Exploring the Gap Between the Fear of Terrorist Recidivism and the Evidence,” *CTC Sentinel*, 13(4), April 2020, pp. 19-29. <https://ctc.westpoint.edu/overblown-exploring-the-gap-between-the-fear-of-terrorist-recidivism-and-the-evidence/>.
- ³⁸ Case 10/996668-17, District Court Rotterdam, Judgment, 3 February 2021. <https://uitspraken.rechtspraak.nl/#!/details?id=ECLI:NL:RBROT:2021:720&showbutton=true&keyword=10%252f996668-17&idx=1>.
- ³⁹ Rodermond et al., “Re-integratie en recidive na een verblijf op de TA”.
- ⁴⁰ NOS Nieuws, “Terroristenafdeling in vrouwengevangenis Zwolle breidt uit,” 14 December 2022. <https://nos.nl/artikel/2456385-terroristenafdeling-in-vrouwengevangenis-zwolle-breidt-uit>.
- ⁴¹ Kats et al., “Terroristen in detentie. Een overzicht van de ontwikkeling en discussie over de terroristenafdelingen in Nederland, 2004-2022”.
- ⁴² Based on an interview with prison official.
- ⁴³ See Article 40a, Regeling tijdelijk verlaten van de inrichting [Regulations for temporarily leaving the institution]. <https://wetten.overheid.nl/BWBR0010171/2021-12-01/#Hoofdstuk5>.
- ⁴⁴ Tweedekamer, “Verslag van een schriftelijk overleg over de reactie op verzoek commissie over Nederlandse uitreizigers in Syrië,” Kamerstuk 29754-650, 22 November, 2022. <https://www.tweedekamer.nl/kamerstukken/detail?id=2022D48646&did=2022D48646>.
- ⁴⁵ In practice, the Dutch Probation Service already informs the court of these steps in their ‘Advise’ prior to the deprivation order after a criminal conviction. The Dutch Probation Service believes that a person should be supervised by Repatriation and Departure Service of the Ministry of Justice and Security. Interview 18 December 2023.
- ⁴⁶ Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, “Zorg- en Veiligheidshuizen.” https://www.regioatlas.nl/regioindelingen/regioindelingen_indeling/t/zorg_en_veiligheidshuizen.
- ⁴⁷ Ministerie voor Veiligheid en Justitie, “Evaluatie van het actieplan integrale aanpak jihadisme,” Inspectie voor Veiligheid en Justitie, 15 September 2017. <https://www.inspectie-jenv.nl/Publicaties/rapporten/2017/09/06/evaluatie-van-het-actieprogramma-integrale-aanpak-jihadisme>.
- ⁴⁸ Tweedekamer, “Wet gegevensverwerking persoonsgerichte aanpak radicalisering en terroristische activiteiten,” Wetsvoorstel 36225, 15 October 2022. <https://www.tweedekamer.nl/kamerstukken/wetsvoorstellen/detail?qry=wetsvoorstel%3A36225&cfg=wetsvoorsteldetails#wetgevingsproces>.
- ⁴⁹ Rodermond et al., “Re-integratie en recidive na een verblijf op de TA”.
- ⁵⁰ Ministerie van Justitie en Veiligheid, “Brief naar aanleiding van mondelinge vragen over de VOG die werd verleend aan veroordeelde IS-ganger,” 26 October 2023. <https://open.overheid.nl/documenten/dpc-b583733f35a46cc3be0d4b02d752259dcfcb45e9/pdf>.