Reducing the risks posed by Dutch returnees from Syria by transferring Germany’s experiences in their fight against the radical right to the Netherlands.

By: Henrique Franssens

Abstract
This article investigates one aspect of what the Dutch government can do to reduce the risks posed by Dutch jihadists who are currently fighting in Syria. The Dutch government has developed a comprehensive action programme to combat jihadism which outlines measures designed to combat the jihadist movement in the Netherlands. The comprehensive action programme includes plans to develop an exit facility to help people leaving the jihadist movement. Furthermore, a support facility needs to be created, based on the German network model. Of this network the Hayat programme will be analysed in-depth together with the EXIT-Deutschland programme. Hayat is a civil society programme that includes working with relatives of radicalised individuals and tries to de-radicalise these individuals. Hayat’s programme is amongst others based on experiences gained from EXIT-Deutschland, a de-radicalisation programme focusing on de-radicalising individual members of the radical right movement. The exit-facility that the Dutch government wants to create and the support facility are only explained vaguely and have not yet been introduced. This research investigates how and to what extent Hayat’s and EXIT-Deutschland’s elements can successfully be transferred to the Netherlands. This research recommends focusing on disengaging instead of de-radicalisation. The programme should be executed by an NGO with expert witness status. Furthermore, an active approach to contacting returnees is considered best in line with the Dutch government’s objectives. Important elements of the German programme can be transferred to the Netherlands. These elements include using a personal approach, providing returnees with alternatives and family counselling, and generally - apart from the already existing repressive measures - focusing on positive measures. This article also outlines the ways in which such a transfer of best practises can be best achieved.

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Introduction

This article investigates certain measures that the Dutch government can implement to reduce the risks posed by returned Dutch jihadists who were fighting in Syria. The number of foreign fighters in Syria has increased exponentially and is a growing concern, also for Dutch policy makers (Bakker, et al, 2013). Syria is the number one jihadist destination and jihadist battlefield in the world. Returning jihadists are considered a threat by the Dutch government since they could, for example, prepare and even carry out terrorist attacks. It is assumed that the returnees have most probably developed more radical ideas and gained fighting experience. Therefore the government has announced in The Netherlands comprehensive action programme to combat jihadism that it is developing new programmes and measures aimed at deterring Dutch jihadists. The action programme has three comprehensive objectives, namely to protect the democracy and the rule of law, to combat and weaken the jihadist movement in the Netherlands, and to remove the breeding ground for radicalisation (Ministry of Security and Justice, 2014: 2). The comprehensive action programme includes plans to develop an exit facility to help people leaving the jihadi movement. Furthermore, a support facility needs to be created, based on the German Hayat programme (Ministry of Security and Justice, 2014: 8-17). The German Hayat programme is a civil society programme that focuses on the environment of highly radicalised individuals and foreign fighters, and tries to de-radicalise them. The programme is based on experiences gained from EXIT-Deutschland, a de-radicalisation programme focusing on de-radicalising individual neo-Nazi’s (Koehler, 2013: 185). German governmental institutions and NGOs have developed various policies and practices and have taken different

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measures aimed at combating the radical movements. The Hayat programme is part of a German nationwide counselling network of which three other NGO’s are also part of. This German model is government financed and organised by a public-private partnership between the ministry of the interior and four NGOs. The facilities that the Dutch government wants to create based on the Hayat programme and the exit-facility are only explained vaguely. Therefore, we do not know to what extent the Dutch authorities are willing to copy the Hayat programme and how they want to develop the exit facility. This research will investigate to what extent the German main elements can be successfully be applied in the Netherlands. This leads to the explanatory research question: To what extent can the main elements developed by the Hayat and EXIT-Deutschland institutions, aimed at reducing the risks posed by radicals, effectively be transferred to the Netherlands?

In order to investigate this we have to find out whether programmes like the Hayat and EXIT-Deutschland (EXIT) can be transferred to the Netherlands. Therefore we will firstly start with a short theoretical introduction (part one). The theoretical introduction will contain the policy transfer theory. Subsequently, in paragraph 1.2, we will focus on the deradicalisation and disengagement theory. This is important in order to find out what the best way is to deal with Dutch returnees. Therefore it will be investigated what has been researched so far regarding the effects of different programmes. Thereafter, in paragraph 1.3, the danger of Dutch jihadists coming home from Syria will be discussed. It is important to know to what extent these returnees do form a threat to society when returning home.

Then, in part two, will be analysed which similarities can be identified between right-wing radicals in Germany and Dutch jihadists. This is important to determine to what extent these two groups can be compared and if German measures targeting right-wing radicals can also be transferred to Dutch jihadi returnees. Thereafter, in paragraph 2.2 this research will investigate which are the main elements of the Hayat and EXIT programmes. This is necessary to determine on which policies and practices this research should focus.
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Here, attention will be given to the way of working of Hayat and EXIT and their environment in which they operate. Here, special attention goes to the body of academic literature on radicalisation and de-radicalisation provided in 1.2. In paragraph 2.3 this research will investigate whether Hayat’s and EXIT’s main elements can be applied in the Netherlands. It will be made clear which of their main elements can indeed be applied to Dutch returnees, as additional instruments to be used in conjunction with existing plans. The conditions for successful policy transfer will be investigated, in order to determine if effective policy transfer is possible in this case. Therefore, this section will analyse this issue on the basis of the policy transfer theory provided in paragraph 1.1. The hypotheses stated by Rose with regard to the policy transfer theory and the conditions given by Stone, Dolowitz and Marsh will be the main sources used in the analysis.

Part three, the conclusion, will answer the central research question and give some policy recommendations and practical implications of the research. Furthermore it will discuss the limitations of the research findings and discuss possible avenues for future research.

Part 1: Theoretical introduction

1.1 Policy transfer theory

In order to determine whether Hayat’s and EXIT-Deutschland’s policies and practices can be transferred to the Netherlands, this research will use the policy transfer theory. According to Dolowitz and Marsh, policy transfer and lesson drawing refers to a “process in which knowledge about policies, administrative arrangements, institutions and ideas in one political setting (past or present) is used in the development of policies, administrative arrangements, institutions and ideas in another political setting” (Dolowitz, et al, 2000: 5). In order to determine how you can ‘import’ policies from another country, this research will use, amongst others, Rose’s theory regarding policy transfer. Rose
describes that “finding a programme that has brought political satisfaction elsewhere does not guarantee that it can be transferred effectively” (Rose, 1991: 5). So, under what circumstances and to what extent can a programme that has proven to be effective in one place be transferred to another place? To a certain extent each country has unique problems associated with its own time and place in history.

Ways of lesson drawing

Rose states that there are five alternative ways of drawing a lesson and transferring it, namely: copying, emulation, hybridisation, synthesis and inspiration (Rose, 1991: 21-22). Copying is “adoption more or less intact of a programme already in effect in another jurisdiction” (Rose, 1991: 22). Copying something from elsewhere is difficult since it assumes that the circumstances and context are the same. Emulation as a means of lesson drawing assumes that a programme elsewhere provides the best standards for designing legislation at home. Emulation implies the adoption of a programme including adjustments for different circumstances in another jurisdiction, so it rejects the idea of copying every detail. Hybridisation combines different elements of programmes from two different places. Synthesis combines familiar elements of programmes from more than two different places. And finally, the inspiration method of lesson drawing uses programmes elsewhere as intellectual stimulus for developing a new programme without an analogue elsewhere. According to Dolowitz and Marsh (2000: 13) “the type of transfer involved in any particular case depends upon factors such as who is involved in the process and where within the policy-making process transfer occurs. Thus, it is possible that, while politicians tend to look for “quick-fix” solutions and thus rely upon copying or emulation, bureaucrats, on the other hand, are probably more interested in mixtures.”
Actors

In addition to different ways of lesson drawing, it is important to investigate which actors are involved in the transfer policy. According to Dolowitz and Marsh (1996: 345) there are six main categories of actors involved in the transfer policy process. These are elected officials, political parties, bureaucrats/civil servants, pressure groups, policy entrepreneurs/experts and supra-national institutions. More than one of these actors can be involved in the transfer of policies. Apart from the advocacy of lessons, policy entrepreneurs and experts are important in order to build a (inter)national network of contacts. This way experts communicate with others from inside and outside the government to spread ideas (Dolowitz, et al., 1996: 345-346). Supra-national organisations are involved in the policy transfer since they stimulate other nations to compare elements of foreign programmes that they may wish to copy. One of the areas that Stone (2004: 545) focuses on is the role of actors in the transfer policy process. According to Stone, actors that should be included are international organisations, states and non-state actors. So, the actors in transfer policy are very broad and consist of individuals, networks and organisations. The key actors involved in the transfer policy are according to Stone international organisations and non-state actors (e.g. interest groups, NGO’s, think tanks, consultant firms, law firms and banks). These non-state actors have been shown to have a lot of influence on setting agendas and should not be forgotten in our efforts to understand the transfer policy process (Stone, 2004: 550).

Success factors

Knowing which actors could be involved and the possible ways of policy transfer, we need to investigate what the different factors are that can constrain policy transfer (Dolowitz, et al, 1996: 353). According to Rose (1988: 227-228) the following six hypotheses are of interest:
1. Programmes with single goals are easier to transfer than programmes with multiple goals.
2. The simpler the problem, the more likely transfer is to occur.
3. The more direct the relationship between the problem and the solution, the more likely it is that transfer will occur.
4. The fewer the perceived side effects a policy has, the more likely transfer will occur.
5. The more information agents have about the functioning of a programme in another country, the easier it is to transfer.
6. The more easily outcomes can be predicted, the simpler a programme is to transfer.

In addition to this, another of Stone’s remarks has to be taken into account. She argues that ‘soft’ forms of transfer policy (e.g. the spread of norms and knowledge) are needed as a complement to the ‘hard’ transfer of policy tools, structures and practices (Stone, 2004: 546). With the ‘soft’ policy transfer non-state actors do play a more prominent role. According to Stone, non-state actors are better at transferring the ‘soft’ forms, influencing public opinion and policy agendas. On the other hand officials are more involved with the ‘hard’ transfer of policy tools, such as formal decision-making, legislation and regulation (Stone, 2004: 556).

Policy failure

Although the aim of policy transfer is to be a ‘success’, with the underlying assumption being that policies that are successful in one country will also be successful in the other, it is not always the case. As Rose (1991: 5) stated, to a certain extent each country has unique problems related to its own place and time. Dolowitz and Marsh give three factors that are of significance with regard to policy failure. The first is the process of uninformed transfer, which states that the borrowing country does not have enough information about the
policy/institutions and exactly how it operates in the country borrowed from. Second, is the *incomplete transfer*. When this is the case, crucial elements for success are not transferred, which leads to failure. The third and last factor is *inappropriate transfer*. Here, too little attention has been given to the contexts and differences between the two countries. This could refer to economic, social, political and ideological contexts (Dolowitz, *et al.*, 2000: 17).

1.2 *Ways to develop de-radicalisation programmes*

In order to find out what the best way is to deal with Dutch jihadist returnees, it is important to investigate what has been researched so far regarding the effects of different programmes. Based on the interviews and literature it seems that the discussions whether institutions should focus on changing somebody’s ideology (de-radicalising) or only change somebody’s behaviour (disengaging) are the key issues for establishing an institution focussing on radicals.

*De-radicalisation and disengagement*

There are different views concerning what can be considered as successful de-radicalisation. Do we consider people de-radicalised when they stop killing others? Do we consider people de-radicalised when they no longer have any contact with a radical group? Or do we only consider people de-radicalised when they have stopped having radical ideas?

Bjørge and Horgan approach de-radicalisation from a scientific perspective. They state that disengaged people are not necessarily de-radicalised. Should the programmes only emphasise the changing behaviour that is related to (militant) radical-right groups or should we also focus on the whole mind-set and therefore try to change the radical ideological values? Many programmes are based on the idea that an ideological change is only possible if the radical group is left behind. But only leaving the group behind does not necessarily
mean that a person is prepared to give up his or her radicalised thoughts and values (Bjørgo, et al., 2009). There is a real danger of ideologies popping-up after a while if programmes do not pay sufficient attention to ideology. According to Van Donselaar this sometimes happens. After World War II the climate was difficult for former Nazi supporters, and there was a very negative reaction and revulsion towards Nazi ideas in society, so many people with radical Nazi sympathies, especially those with children, kept quiet. When the children grew older, the parents started expressing their Nazi ideas again. There were also cases of people who were salary men after WW II and only started expressing their old radical ideas and values when began receiving their pensions (Interview Van Donselaar). So de-radicalisation focuses on changing radical ideological values, attitudes and views. Disengagement focuses on only changing radical behaviour without changing the ideological values, attitudes and views.⁵

De-radicalisation or disengagement?

In order to decide whether we should focus on de-radicalising or disengaging, the first step should be to find out to what extent the degree of ideology plays a part. As stated later, and also according to Silke (2011), the degree of ideological belief does often not seem to be the main indicator of whether or not somebody is likely to get involved in a terrorist organisation. If the aim of the de-radicalisation/disengagement programmes is to reduce the risk that a person presents to society, maybe disengagement is enough. Should we therefore only focus on disengagement? It may be true that people do not enter radical movements because of their radical ideology, but once they are in the radical movement, they can develop radical ideas. According to the General Intelligence and Security Service of the Netherlands (2010), https://toolbox-extremisme.nctv.nl/documentatie/onderzoeken/disengagement-en-deradicalisering-van-jihadisten-in-nederland (visited on October 20th 2014).

Netherlands, disengagement does happen more frequently with jihadists than de-radicalisation.\textsuperscript{4} When they disengage, jihadists stop their radical behaviour but continue to support the jihadist ideology. They will not contradict jihadist thoughts, will continue having radical contacts and will not stop others from committing terrorist attacks. When jihadists do de-radicalise, this is almost always preceded by disengagement. De-radicalisation is therefore not a prerequisite for disengagement. However, the opposite can also happen; somebody starts changing his or her behaviour (disengaging) and finally starts to lose faith in their radical ideology (de-radicalising). The factors that play a part when jihadists disengage or de-radicalise include personal, external and group factors. Personal factors always play a part in disengagement or de-radicalisation. This includes having a partner, a job, a child, etc. The external factors can include a lot of other things such as police intervention or the involvement of a family member. Group factors, e.g. the arrest of a group’s leader, influence the whole network the individual belongs to.\textsuperscript{5} All these conditions can influence which path jihadists choose to follow. However, this does not mean that personal factors necessarily change their radical thoughts. The influence of ideology is unclear. According to the Dutch secret service, contradicting the ideology does not seem to be of added value, since arguments are pushed aside or sometimes not even noticed by the radical. In cases of successful de-radicalisation, personal and external factors had a huge impact, and the alternative (de-radicalised) thought only started to play a part at a later stage.\textsuperscript{6} According to Silke (2011), the most successful proven disengagement programmes in the last fifty years were implemented in Spain and Italy in the eighties. The circumstances


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were totally different but both programmes focused solely on disengagement and not on changing attitudes and opinions. Furthermore the (terrorist) participants voluntarily agreed to participate in the project: “the terrorists who took part had already made the decision to change before they applied to the programme. The programme did not convince them that continued life as a terrorist was wrong or unjustified; rather, it allowed them access to a third way once they had already reached that decision for themselves” (Silke, 2011: 19).

However, unlike the programmes in Spain and Italy, ideology and thoughts have become a central element of modern programmes.

EXIT claims to be one of the world’s most successful de-radicalisation and disengagement programmes for right-wing extremists, however this research has not find any objective external evaluation of this statement (Koehler, 2013: 185). Although it is too early to say, according to Koehler the focus on the ideology of the Hayat programme is also one of the success factors of their programmes (interview Koehler). Daniel Koehler worked for Hayat and EXIT-Deutschland and was the head of Research for those organisations and is currently the Director of the German Institute on Radicalisation and De-radicalisation Studies GIRDS in Berlin (the viewpoints expressed in the interview with Koehler are solely his own, based on his knowledge and experience and do not necessarily represent the official viewpoint of EXIT-Deutschland and Hayat). With ideology is meant (Hall, 1996: 25-26) “the mental frameworks–the languages, the concepts, categories, imagery of thought, and the systems of representation–which different classes and social groups deploy in order to make sense of, figure out and render intelligible the way society works”. Koehler states that if you do not focus on the ideology, people could re-radicalise in another group.

According to Speckhard (2010: 11) successful programmes “must find a way to successfully sort through and identify prisoners or detainees according to their level of radicalization”. Depending on the degree of radicalisation, the programme needs to be adjusted to take account of both the original and the current motivators. Radicals must be
approached contextually and attention should be given to subjects that are important to them (e.g. violation of sacred values, desire for revenge, discrimination, etc.). Special attention needs to be given to the factors that got them involved. Furthermore it is important to pay close attention to what happens to the returnee after they have disengaged or de-radicalised, including, for example, participation in job programmes. Skill training can be provided in areas such as computers, languages and literacy, which make it easier to get a job (Speckhard, 2010: 10-11). According to Speckhard ways to disengage or de-radicalise individuals could be, among others, through intimidation, imprisonment and amnesty programmes, providing activities that attract radicals away from violence into non-violent activities and de-radicalising prisoners through prison programmes (Speckhard, 2010: 2). Speckhard maintains that jihadists will continue to have radical thoughts if they are only disengaged. They could still form a danger to society since disengaged radicals appear to re-engage easily (Speckhard, 2010: 2). Gadd (2006: 180) also states that any effective de-radicalisation programme has to emphasize the de-legitimisation and invalidation of the relevant narratives and interpretations. Furthermore, the radical ideology has to be dismantled during the de-radicalisation process and the individual has to arrive at a critical self-assessment of his or her past. According to Horgan and Braddock (2010) the effectiveness of de-radicalisation programmes increases substantially when the ideological dimension is included.

Providing alternatives

According to the senior policy maker (interview) – and as Daniel Koehler states – providing returnees with alternatives is a key element in diminishing the danger that somebody could present to society. Reducing this danger is Dutch government’s only aim (interview Senior policy maker). It provides a way in which to establish an alternative reference group, which helps to take individuals out of their old environment. This method
also provides a way of breaking through the radicalised individual’s ideological isolation and encouraging him or her to abandon radical structures.

Bakker argues that the Dutch government should be careful about adopting policies towards returnees which are too strict, since there is not only one type of returnee. If you approach every returnee in a manner based on the worst case scenario, and you therefore treat them as potential terrorists, you run the risk of creating distrust and unnecessarily strengthening enemy images. Returning jihadists will react accordingly. This approach can unwittingly lead to a self-fulfilling prophecy (Bakker, 2013: 4). It is better to focus on positive measures and to a lesser extent on repressive measures. In Germany, different kinds of repressive measures, such as banning manifestations, flags, symbols, etc. have also produced negative results. For example, banning radical-right music bands and locking up the artists increased the band’s popularity by giving them cult status in the scene. Repressive measures have so far been unable to stop the growth of radical-right violence and therefore more preventive measures are being introduced. According to Koehler (interview), if the government automatically labels and therefore punishes all the returnees as ‘terrorists’, family members and close friends will be less likely to approach (governmental) organisations. This could be quite worrying since according to all people who were interviewed, friends and family members of returnees are an indispensable part of the successful monitoring of returnees. Without contact with the returnee’s immediate environment, the government will not be able to deal effectively with the returnees.

1.3 The danger of Dutch jihadists coming home

Combating radicalisation is an important element in the fight against Dutch jihadists as described in The Netherlands comprehensive action programme to combat jihadism (Ministry of Security and Justice, 2014: 3). There are different reasons why the Dutch government wants to prevent the journey to Syria and increase control of the jihadists
returning from Syria. As discussed, authorities try to combat jihadists because they believe that jihadists can become a threat to national security when they return to the Netherlands after internalising (more) dangerous radical ideas and gaining fighting experience. National security is at stake when vital interests of the state and/or the society are threatened in such a way that there is (potential) societal disruption. National security includes both breach of security by deliberate human action (security) and damage by disasters, system or process errors, human errors or natural anomalies such as extreme weather (safety). On return to the Netherlands, jihadists could help to prepare attacks or even execute them. According to the authorities, the jihadists are a threat to national security since they have anti-democratic beliefs and are prepared to use extreme violence to combat the ‘enemies’ of Islam or even destroy them. According to the director of United States government’s National Counterterrorism Centre, Matthew Olsen, jihadists might return to Europe or the USA as part of a global jihadist movement. Since the nineteen fifties large numbers of Muslims have been living in Europe, including in the Netherlands. Muslim immigrants came mainly as “guest-labourers” from Turkey and North Africa (Pittomvils, 1997: 432). A study showed that 71 percent of young Muslims in the Netherlands see their friends who are fighting in Syria, as “heroes defending Muslims and fighting against the brutal regime of Bashar Assad”.

It is rather difficult to find a clear answer as to whether and to what extent returning jihadists form a threat to Dutch society after having fought in Syria and returned home. According to different media and governmental sources it is clear that Dutch jihadists in

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general *can* form a threat when returning to the Netherlands. According to the Royal Netherlands Marechaussee, returnees from Syria do form a risk to Dutch society since they are willing to sacrifice their lives for the Islamic cause. Furthermore they have practical fighting experience and have undergone specific training. Moreover, the jihadists have a reduced tolerance regarding Western norms and values and they behave in an anti-integrative manner concerning Dutch society. Furthermore, the jihadists have an high status within their own sub-society and act there as role models. Also, returnees can have psychological problems due to their experience of fighting in Syria. And finally, the returnees can provoke unrest within the moderate immigrant communities (Royal Netherlands Marechaussee, 2013: 1). According to Daniel Koehler, it would not make sense for so many jihadists to come back and attack the Netherlands. They go to Syria because they want to fight abroad in a specific context, his assumption being that the conflict is theologically tied to the geographical region. It would make more sense for the jihadists to stay there, to fight or to die since many jihadists want to die as a martyr. Another possibility would be to go to another battlefield where the Muslim community is being attacked or suppressed, which is in fact what many of them do. It would not make sense to come back and attack the Netherlands. It would make more sense to return, collect money, and recruit more people. Koehler is therefore not convinced that the group of returning jihadists form a real security risk (interview Koehler). What Koehler does believe can happen is that jihadists who come back may be severely traumatised, have no clear vision or future, no job, and may be very frustrated from their battlefield experiences, but no one seems to care. If this is what the jihadists return to, and they receive no help or guidance, they may fall into a black hole and decide to go back to their radical group. If returning jihadists feel oppressed and are subject to harsh interrogation by the police, if they are treated as terrorists, this might be enough to push them precisely in that (radical) direction. According to Koehler jihadists return to their home country because they are demoralised,
shocked, and traumatised. In that respect one could see the return of jihadists as a sign of de-radicalisation (interview Koehler). Furthermore, if returnees are dealt with as if they were terrorists, it would discourage family members from contacting authorities since this would have major consequences for them.

On the other hand, there is the case of Mohamed Merah. Merah, a Frenchman of Algerian origin, who fought in Afghanistan and Pakistan after being radicalised in a French prison, proves that returnees do pose a real threat. After returning to France, Merah killed several French soldiers and Jewish citizens. Furthermore, about twelve per cent of the terrorist attacks in Europe after 9/11 were committed by terrorists who had been trained or had been fighting abroad. Apart from direct terrorist attacks, the psychological problems of returnees can lead to other problems such as domestic violence, aggressive behaviour or suicidal tendencies (Bakker, 2013: 4).

Thomas Hegghemmar from the Norwegian Defence Research Establishment states (Hegghammer, 2013) that around ten per cent of foreign fighters returning to their homes in the West, want to commit also attacks in the West. As well, according to Hegghammer most radicalised Muslims want to fight abroad and not in their home country in the West. But once abroad they get into a very isolated environment (no influences from modest views), or are sometimes specifically selected abroad and trained for terrorism in their home countries and are getting used to violence. According to Hegghemmer (2013: 11) several sources suggest that returnees are overrepresented when it comes to attacks in their home countries. According to Sageman networks including a jihadist veteran doubles the probability of a planned attack reaching execution (Sageman, 2010). Clarke and Soria (2010: 28) noted that “seven of the eight major terrorist plots in the UK included in their cells one or more individuals who had attended terrorist training camps”. Remarkable is however that stopping jihadists going abroad can also have a reverse affect. Hegghemmer (2013: 12) points out that it is known that several plot participants acted at home because their
travelling to foreign destinations was obstructed. In conclusion, around 90 per cent of the jihadists who return home after fighting in Syria, need probably special attention because they are e.g. traumatised, but the other 10 per cent can become very dangerous. The challenge will be to identify this 10 per cent and to treat the 90 per cent with care (Hegghemmer, 2013).

So, there are (potentially) dangerous and non-dangerous returning jihadists. There are returnees who will not form a problem when returning if they can be motivated to make something of their lives (Bakker, 2013: 4). According to Bakker, Paulussen and Entenmann we need to know a few things in order to make a good assessment of the potential risk of the returnees: we need to know their reasons for going to Syria and the people they were with, the type of activities they undertook in Syria and the location of the activities and their accomplices, the reason(s) for returning from Syria and lastly whether or not they have in fact returned and, if so, where they returned. Unfortunately, this information is quite hard to get despite the huge efforts by government agencies to improve the provision of information. Dutch authorities do not know the exact number of Dutch jihadists fighting in Syria, how many have died or have already returned, and they certainly do not know the role that the Dutch jihadists played in Syria, let alone whether they have been radicalised, disillusioned or traumatised (Bakker, et al, 2013: 6).

Part 2: Analysis

2.1 Comparing Dutch returnees and German radical right members

This part will investigate which similarities can be identified between members of the German radical right and Dutch jihadi returnees from Syria. It is important to find out if and to what extent members of these two groups are similar enough to provide a basis for comparison, and whether or not German measures that target right-wing radicals are relevant and can be transferred regarding Dutch jihadi returnees. The similarities between
the two groups will be investigated by looking at various factors: the radicalisation process, background and the threat.

The radicalisation process

According to Koehler, the radicalisation process of Dutch jihadists and radical right members is in many respects quite similar, including the motivation for entry (interview Koehler). Although there are many ways and reasons why radical right members and jihadists join their movements, there are not many similarities between the jihadists and right-wing radical ideologies. According to Koehler, many people join the jihadist environment for value-related reasons like sense of justice, freedom, oppression against Islam and also because they are concerned about their afterlife and their soul. This is different from the right-wing environment. However, despite the differences in content and ideology, the processes of radicalisation itself is often similar for both members of German radical right groups and Dutch returning jihadists. There have been even cases of German right-wing radicals who have converted to Islam and are currently fighting as jihadists abroad (interview Koehler). As stated before in 1.2, ways to develop de-radicalisation programmes, some scholars have argued that ideological motives are rarely the real reason for joining radical movements. Factors that do play a part in the decision to join the radical right movement in Germany include sympathy for the underdog position of the radical right versus radical and violent opponents. Other factors are protection against enemies and perceived (foreign) threats, curiosity, looking for sensation and rebelling against the older generations. Furthermore, there is a search for an alternative to family or parents and for friends or community. Moreover, there is a quest for status and/or identity. Radical right members are also much influenced by the media (Van der Valk, et al, 2010: 15-16). These reasons for joining the radical-right movement are to a large extent the same as the reasons jihadists have for joining radical Islamic movements. Like members of the radical right in
Germany, it appears that Dutch jihadists usually do not join the movement for ideological reasons. They can, however, be formed ideologically, and can radicalise while they are active in the movement or fighting in Syria. Furthermore many Dutch jihadists argue that they want to stand up for their ‘Muslim brothers’ who are being oppressed, and they want to help overthrow the Assad regime (interview Pannekoek). This is where factors such as a sense of injustice, protection against enemies and perceived (foreign) threats come into play. Maybe we can even see sympathy for the underdog versus radical and violent opponents as a part of this. Moreover, the search for an alternative identity and the greater respect that jihadists hope to find in the jihadist community, are similar to the motivation for joining radical-right movements. As the senior policy maker stated (interview), jihadist propaganda also provides alternatives since it offers a way out of the criminal environment and to improve their lives.

Muslims who radicalise are mostly second and third generations migrants (interview Pannekoek). This is in contrast to their parents, who are first generation immigrants, and who have a reference point in their country of origin. They know how Islam was practiced in the home country; they were schooled in that way. Youngsters of the second and third generation do not have this knowledge. It is also one of the reasons why these young people are prone to criminal behaviour. They speak almost no Arabic, do not know the Koran well, and when they reach puberty they may suffer an identity crisis because they are not considered Moroccan in Morocco, or Dutch in the Netherlands. These young people start identifying with the universal Muslim community and many radical Muslim movements use these feelings to recruit new members. The youngsters are susceptible to these movements since they give them an identity; they feel they are all in it together and that the others will help them if they get into trouble. The first generation was less susceptible to radicalisation (interview Pannekoek). This search for an identity, an alternative family, not
feeling socially accepted, and the search for community also influences the radical-right radicalisation process.

**Background**

It is noteworthy that social-economic circumstances seem to play a limited role in the radicalisation process of Muslims. According to the senior policy maker of the Ministry of Security and Justice (interview), jihadists come from very diverse backgrounds. For example, some of the jihadists travelling to Syria have no schooling and a criminal background, while others are highly educated intellectuals. However, for people with a criminal background the fighting in Syria can mean a new start in life; it is an alternative career opportunity for them (interview senior policy maker). Furthermore, jihadists have different family backgrounds. There have been cases of jihadists whose parents were atheists or were divorced. Sometimes it is the parents who notice the radicalisation process when their children start to eat different food, stop drinking alcohol and start wearing different clothes. Some parents respond to these developments by hiding the Koran or prohibiting them from praying five times a day. Recruiters can use such reactions as proof of an international conspiracy against Islam (interview Pannekoek).

It is interesting to note that social-economic circumstances also seem to play a limited role in the decision to join the radical-right movement in Germany. Many members of right-wing radical groups have good living standards. However, youngsters who join radical movements often do not feel socially accepted and they experience many conflicts in their social life. Troubled relationships at home, with parents, seem to be a more important factor. In many of the families in which these radicalised persons grew up, there is an absence of communication and emotional closeness. This corresponds to a lack of skills among young people and a lack of self-esteem. The societal integration skills of these youngsters are often poorly developed, which influences their functioning at school and in the workplace. It also
has an impact on their overall social participation. Linking up with radical-right movements provides compensation for this. There is however not one way but many ways in which people become part of the radical-right movement (Van der Valk, et al, 2010: 15-16).

The threat posed

Both radical groups can form the same direct threat, since they are able and willing to commit direct violent attacks. Moreover, Dutch jihadists and German right-wing radicals pose the same threat to society as their actions can give rise to social polarisation.11

If they are part of the radical-right movement for a long period of time, members become more and more involved in violent confrontations. Violent victories over enemies (extreme-left, anarchists) and defeats (arrests) lead to more group bonding and cohesion. This makes it harder to leave their environment. Furthermore these violent actions make it harder to stay in close contact with their relatives. So, the longer a person is part of a radical group, the harder it is to leave the group. If they do decide to leave the radical-right group, the disengagers may face harsh punishment from the movement. Some radical right movements even have kill squads for dropouts (interview Koehler). This could also be the case with jihadists returnees. De-radicalising returnees face problems from support groups of the global jihad who want to frustrate their reintegration and may even threaten them since they are considered traitors (Bakker, et al, 2013: 8).

Although German right-wing radical groups react aggressively towards disengagers, according to Koehler there are more problems with civil society accepting the dropout than with the former radical group (interview Koehler). There is little information available about how society in general responds to returnees (interview senior policy maker).

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However, the negative coverage in the Dutch media of Dutch jihadists fighting in Syria could have unfavourable consequences for the social acceptance of returnees.

**Conclusion**

In conclusion we can state that, in general, there are differences between the respective situations of members of the German radical right and of returning jihadists, but there are also a significant number of similarities. Most of the overlap is in the area of why persons feel attracted to such movements. Convictions and ideology do often not play a major role in the early phase of radicalisation. Ideological radicalisation usually occurs in the second phase. Knowing this, we can state that key aspects of the radicalisation of both German right-wing radicals and Dutch returning jihadists mean that the two groups are to a certain extent comparable.

2.2 Main programme elements regarding terrorist solutions

This paragraph will examine whether we should focus on de-radicalisation or disengagement, on whether or not governmental institutions should carry out the programmes and whether we should actively approach Dutch jihadists. These discussions happen to be key issues for developing ‘de-radicalisation’ programmes. Furthermore will be discussed which are the main programme elements of Hayat. Since we already know that key elements regarding the radicalisation of German right-wing radicals and Dutch returning jihadists are comparable, we will investigate which (part of) policies and practices should – if possible – be transferred to the Netherlands. Therefore we should first investigate how Hayat and EXIT programmes work and in which environment they operate.
Hayat’s environment and its way of working

In 2009, Germany considered itself at risk because of an increased threat of international Islamists terrorism. Especially with the increase in the number of German Islamists willing to engage in violence, who were leaving the country to join jihadist organisations abroad. Apart from taking a large number of measures, Germany looked for a way to play an active role in the prevention of Islamism and in de-radicalisation which lead to the ‘AG Deradikalisierung’ (Endres, 2014: 4). This AG Deradikalisierung was divided into different sub-working groups, leading to “the widest possible assortment of topic ranges relating to the area of de-radicalisation” (Endres, 2014: 4). This included preventive programmes focussing on the deconstruction of the jihadists ideology and programmes focussing on the radicalised individual through direct communication in order to achieve de-radicalisation (Endres, 2014: 4). The German security services also found of importance “the fact that relatives and social environment of radicalised individuals find themselves in a situation of particular strain, and at the same time may well be able to play a significant role in a successful de-radicalisation (Endres, 2014: 5).

The working group that is responsible for providing counselling and support for the environment of the radicalised individuals is led by the German Federal Office for Migration and Refugees (BAMF). In order to do their work effectively they found it necessary to involve both parties from the civil society and a central state-run contact and coordination point (Endres, 2014: 5). The Federal Ministry of Interior finances the positions of the employees and Hayat is from the start one of the institutions that are in a partnership with the BAMF. Other current partners are VAJA and its ‘kitab’ counselling centre in Bremen, who are busy with cases in North Germany. In the South of Germany is the Violence Prevention Network (VPN) dealing as a partner of the BAMF (Endres, 2014: 6-7) and in the West the IFAK e.V. association in Bochum.
One of the central strategies of the BAMF regarding German jihadists is a counselling approach. “Since January 2012, the BAMF has been providing a nationwide Advice Centre for everyone seeking advice and help because they feel, or have concrete reasons to believe, that someone within their social environment is becoming increasingly radicalised in an Islamist direction” (Endres, 2014: 2). This strategy focuses on the whole environment of radicals including relatives, teachers and friends advising them how to deal with the situation. The BAMF can for instance supply a local cooperation partner that is able to counselling. “The initial aim is to provide reinforcement for the radicalised individual’s social environment, lessening the strain on the persons involved and thereby preventing any breakdown in communication between those in search of counselling and the individual in question” (Endres, 2014: 1).

The BAMF and its partners have set up the first nationwide point of contact for people who need advice. This initiative was encouraged and promoted by the Federal Ministry of the Interior (Endres, 2014: 17). According to Endres this counselling system “using one authority as the initial point of contact and coordinating body in conjunction with civil society institutions as cooperation partners” (Endres, 2014: 17) has turned out highly efficient.

Anyone who wants to get in contact with the BAMF’s Advice Centre can call the hotline or send an email. When the caller has described the situation, the BAMF employee determines what is required and gives advice. Often, during this phone call, detailed information is given which makes it possible to discern key factors that have turned the individual towards radicalism such as e.g. identity crisis, problems at school or work or conflicts within the family (Endres, 2014: 7). The caller will subsequently be offered to get in touch with one of the partners, free of charge. Depending on the region and whether one of the partners is experienced, it will be determined who will be responsible for helping. Unless aspects emerge that are relevant in security terms, callers will be guaranteed
confidentiality (Endres, 2014: 7). This is where Hayat can start playing a role. If Hayat is appointed as the partner who will be dealing with the case, there will be personal meetings between the counselling team and the one(s) seeking for advice. This phase is important to build a trusting relationship with those asking for help (Endres, 2014: 8). In this early phase, attention is given especially to which scene somebody is moving to, the reasons for joining a radical movement and concrete information regarding visits to mosques and activities on the internet in order to get a clear picture (Endres, 2014: 9). An important role that the partner, such as Hayat, plays here is developing a strategy how to initiate the shift towards de-radicalisation. Special attention has to be given here to the needs of the radicalised person. Furthermore, attention is given to the ways the environment communicates with the radicalised person. Subsequently other institutions can be involved in the de-radicalisation process such as official bodies and schools. It is of most importance to make the radicalised person aware of suitable alternatives. In general different conversations are needed in order to provide good help (Endres, 2014: 9-10). During this entire process, Hayat has to provide regular updates of the counselling process to the BAMF. “And should developments emerge that are of relevance in security terms, or should it become necessary to involve the security services, the BAMF coordinates these cases, acting as the interface between these authorities and the cooperation partners” (Endres, 2014: 9). Another role that Hayat, and other counselling partners, can play is putting relatives of different extremist individuals in touch so they can exchange stories with people who experience the same (Endres, 2014: 10).

This way of working of Hayat is an affective approach. This approach “aims to provide the individual with emotional support and to create an alternative peer group to counteract the radical affective structure of the individual” (Endres, 2014: 3). The aim of providing counselling is to offer support to the social environment of the radicalised individual, and by doing that creating the kind of support system necessary for a de-
radicalisation process. The environment of the radicalised person seems to be the final point of contact with mainstream society. Therefore the environment plays a crucial role. Furthermore does the environment often recognise radicalisation in an early phase (Endres, 2014: 3). Key elements of the Hayat and EXIT-Deutschland programme are according to Koehler looking where the people are when they contact the BAMF and designing and handcrafting the de-radicalisation process for that person. There is a big difference between someone who has studied philosophy, was a group leader and wants to leave, and on the other hand a seventeen-year-old skinhead who just needs a new job and a little bit of talking about the group. Each individual requires a different approach (Interview Koehler). According to Koehler, key to success is always talking about ideology, right from the start. This means talking about what the individual has internalised from the radical ideology; what symptoms or what threats from the ideology. Maybe that person has only joined the group because of its stance on environmental protection. EXIT-Deutschland tries to determine which philosophy, values, and motivational factors were the driving forces behind the decision to enter these movements, and what kept them going. Subsequently it is tried to dismantle these forces by providing positive alternatives (Interview Koehler). However, as mentioned before, this research has not find any objective external evaluation regarding the effectiveness of the Hayat and EXIT-Deutschland programme focusing on the ideology.

De-radicalisation or disengagement?

There are different views as to whether programmes should focus on de-radicalisation or disengagement, as described in 1.2. Some scholars argue that disengagement is far more effective. Even though views on this issue differ, it has become clear that disengagement is easier to achieve than de-radicalisation. But, according to other scholars, if it can be achieved, de-radicalisation is more sustainable. Disengagement is more
likely to happen before de-radicalisation than the other way around.\textsuperscript{12} Furthermore, questions arise about the evaluation of different de-radicalisation programmes. How can you measure whether an individual has stopped having radical ideological values? For the purpose of this research the “disengagement from terrorist activities” approach is preferred to de-radicalisation. This approach is preferred because it is a more objective definition, and because while still very difficult, this definition makes it easier to measure the success of projects aimed at combating radicalisation. Moreover, it would help the Dutch government to avoid the dilemma posed by projects that involve actively trying to change the political, religious and other ideas of its citizens, something it would be very reluctant to do.

This research argues that with the increasing number of Dutch (returning) Jihadists, the Dutch government should focus first on disengagement. That does not imply that de-radicalisation is not worthwhile. Disengagement often appears to be the first step in the direction of de-radicalisation.\textsuperscript{13} De-radicalisation could be a next step at a later moment in time. This research therefore suggests starting with the transfer of the basic ideas and approach of the Hayat and EXIT-Deutschland programmes into a Dutch programme, while focusing on disengagement. In the future, when things settle down, the Dutch programme could move into a de-radicalisation programme.

\textit{Governmental vs non-governmental institutions}

At present the Dutch government seems to be leaning in the direction of disengagement, which is an attitude more in keeping with the country’s democratic principles. Many Western democratic countries regard personal/ideological freedom as a


very important value. The comprehensive action programme set up by the Dutch government to combat jihadism, contains only a vague reference to plans to develop a programme based on the German Hayat programme as well as an exit facility. However, it is not clear whether the Dutch government will do this on its own or if it plans to designate responsibility to another (non-state) actor. If the Dutch government decides to do it by itself, it should focus only on disengagement. Koehler states that EXIT-Deutschland has problems with its legal status since it has to hand over some aspects of its job to the police and other agencies (e.g. providing a new identity and police protection). However, Koehler states that a separation of powers within a democracy is important, he believes that the only institutions that should be able to issue a new identity are the courts and the police. Therefore, Koehler suggests that acquiring an expert witness status would make it easier to ask for assistance and allow the organisation to bypass certain bureaucratic procedures. Furthermore, with expert witness status, statements made in court would carry more weight (interview Koehler). This issue seems to be taken into account within Hayat partnership within the German nationwide counselling network, were they have close contact. According to Endres this counselling system has been “using one authority as the initial point of contact and coordinating body in conjunction with civil society institutions as cooperation partners” (Endres, 2014: 17) turned out highly efficient. Whatever precise roles it will get, any exit or support facility should have a structured co-operation with the existing authorities laid down in a firm legal framework. It will be a public private partnership.

If the Dutch government carries out the programme by itself, it would not face the legal issues that EXIT has. However, in order to be able to move the (disengagement) programme towards a de-radicalisation programme at some point in the future, NGO status would be preferable. In that case, the Dutch government should designate the appropriate people. Setting up an organisation with NGO status could also make it easier to build a relationship of trust between the radicals and the organisation. If this NGO would get an
expert witness status part of the disadvantages of not being a governmental organisation, is mitigated. Furthermore should there be a close cooperation between the NGO and the central government.

**Actively approaching returnees and their environment**

Although the two German NGOs, Hayat and EXIT-Deutschland, wait until they are approached by a returnee or a family member, German governmental programmes actively approach radicalised right-wing individuals (e.g. The BIG REX programme). Given the Dutch governmental view that each returnee is a potential threat, it does not passively wait until being approached by a returnee. This more active approach could suit the Dutch authorities, since they also take a more active approach to identifying and contacting returnees. However, questions arise regarding the legitimacy and trust. Only if returnees are suspected of having committed any illegal activity, they have to respond to the authorities. Otherwise cooperation will have to be on a voluntary basis.

Identifying and monitoring returnees is quite difficult. Since Dutch jihadists can easily travel to Turkey, which is covered by the Schengen agreement (no passport is required, an identity card is sufficient), it is difficult to stop and identify people who are travelling to Syria (interview senior policy maker). It is even harder to prove what people’s intentions were and/or what they have done in Syria. Most of the people fighting in Syria are identified via direct family members or friends who have contact with the jihadist (Bakker, et al, 2013: 5). The government does not have the capacity to conduct non-stop monitoring of all returning jihadists. Since the government depends on the direct social environment of the jihadists for information, it should maintain a good, close relationship with this environment and also approach it actively. This way the authorities can more easily identify jihadists who have travelled abroad and returned home, and it may also make it easier to determine what the motives are for returning and if the individuals in question
are traumatised. So, for the timely detection of jihadists and prevention of terrorist activities in the Netherlands (or other Western European countries), the authorities should avoid harsh, repressive measures with long sentences, as this would widen the gap between them and the returnee’s environment. Good contacts with the returnee’s social environment are an essential part of the effective treatment of returnees.

*Hayat’s and EXIT-Deutschland’s main elements?*

Although it is impossible to draw scientific conclusions about the effectiveness of Hayat and EXIT-Deutschland due to the lack of evaluative studies, the Dutch government wants to transfer these programmes. Based on literature and interviews it shows that Hayat and EXIT seem to have some main elements that are given a lot of attention. We have also seen that some aspects of the programmes should not be transferred to the Netherlands (active versus passive approach, NGO or governmental, directed at disengagement or deradicalisation). The main elements that should be considered for the Dutch programs are:

- Focusing on individuals, processing personal history and focusing on the reasons for joining the movement.
- The necessity to build a *relationship of trust between the radical and employee*. Having a trusting relationship also helps such programmes serve as a bridge between society and security.
- *Strict contracts* are another feature of all of the German programmes. These are helpful because they contain very clear details of exactly what is expected from each party.
- Taking the individual out of their old environment and not letting them have contact with any person from that old environment (providing protection if necessary).
- Reintegration into society (helping with a new social network/finding a job).
- Providing psychiatric support.
- Providing emotional support.
- The institutions serve as a bridge between society and security authorities.
- Attention should be paid to detecting and resolving potential conflicts within the family.
- Helping relatives to develop argumentations and ideological narratives that can counter those of the radicalised youngster (this is not a theological debate!).
- Trying to break through the radicalised person's ideological isolation by giving them the option of abandoning radical structures.
- Providing returnees with alternatives is a key element for diminishing the danger that returnees pose to society. It is also a means of establishing an alternative reference group, and of taking individuals out of their old environment.
- A personal profile is created at the beginning of the de-radicalisation process in the German governmental programmes, as well as in those run by Hayat and EXIT-Deutschland.
- In general: Focusing on positive measures and to a lesser extent on repressive measures. In Germany, different kinds of repressive measures, such as banning manifestations, flags, symbols, etc. have also produced negative results. As repressive measures have so far been unable to stop the growth of radical-right violence, more preventive measures are now being introduced.

Conclusion

It is difficult to state whether the overall working methods of Hayat and EXIT-Deutschland are the best practices since there is a lack of evaluative studies. However it has become clear which main elements of Hayat and EXIT-Deutschland's are used for their programmes. This research recommends building a Dutch exit facility based on the Hayat and EXIT-Deutschland models, but focusing on disengaging instead of de-radicalisation. In the future, when things settle down, the facility could evolve into a de-radicalisation
programme. Furthermore, this research advises setting up an NGO with expert witness status with a close cooperation with the central government. This would be the best possible solution as the organisation would have the advantages of a non-governmental body, but could still avoid some of the disadvantages of being a non-governmental organisation. Lastly, this research is of the opinion that an active approach to contacting returnees fits in best with the Dutch government’s objectives. This research sees a number of main elements that could – provided there are no other constraints (e.g. legal, social, political, etc.) – be transferred to the Netherlands. These elements include using a personal approach (defined in greater detail above), providing returnees with alternatives and family counselling, and generally focusing on positive measures.

2.3 Transferability

This paragraph will investigate whether Hayat’s and EXIT’s main elements described above, can indeed be transferred to the Netherlands. In previous paragraphs it became clear that key aspects of the radicalisation of German right-wing radicals and Dutch returning jihadists can be compared. Furthermore this research has made recommendations as to how the Dutch exit-facility should work. However, we still do not know if and how these German main programme elements can be effectively transferred to the Netherlands. This chapter will make use of the policy transfer theory provided in 1.1. Rose’s hypotheses with regard to policy transfer theory will be applied, as will the conditions formulated by Stone, Dolowitz and Marsh.

Type of lesson drawing

The Dutch government has stated in its action programme to combat jihadism that it would like to introduce a programme based on the German Hayat programme, and to develop an exit-facility (Ministry of Justice and Security, 2014: 8-17). Furthermore, since
the Netherlands has almost no experience in dealing with returning jihadist fighters, we can assume that the Netherlands can learn from more experienced countries like Germany. The type of lesson drawing discussed in this thesis is a clear case of what is called voluntary policy transfer. However, since we can speak of the returnee problem as a European problem it might also have elements of an indirect coercive transfer. With the indirect coercive transfer the potential role of externalities and functional interdependence play a major part.

Main elements of Hayat and EXIT-Deutschland and the existing Dutch measures

Since this research will focus on whether German Hayat’s and EXIT-Deutschland’s main elements can be transferred to the Netherlands, the different regulations, legislation and other contextual variables in each country make it impossible to copy every detail. Emulation seems the best way of lesson drawing here, which implies the adoption of a programme including adjustments for different circumstances in another jurisdiction, and rejects the idea of copying every detail (Rose, 1991: 21). In previous paragraph, main programme elements regarding terrorist solutions, it has become clear which main elements of the Hayat and EXIT-Deutschland programmes could be transferred to the Netherlands.

In order to determine how these programme elements could serve as additional instruments it is important to understand the existing national schemes and plans in the Netherlands. Looking at the existing national schemes and plans it looks like most of the Dutch policies and practices regarding returnees seem to focus on legislative/repressive measures. The Dutch policy regarding returnees is currently to prosecute them based on the principle of discretionary prosecution if there is enough evidence proving that they have committed crimes abroad. If prosecution is impossible, different measures will be applied in order to reduce the threat they may pose (Centre for Security Studies, 2014: 13). An example is placing someone under long-term supervision, based on criminal law (Ministry
of Security and Justice, 2014: 5). According to the Dutch government, the intention is to increase the resilience of groups and individuals in relation to radicalism and to enhance their ties to Dutch society and more generally to the democratic rule of law. But investigating the measures, the focus of most measures seems to be on the punishment of the jihadist and/or on the immediate protection of society. Little attention is given to the individual or to how to make him or her a more civil and less radical person. The Dutch government’s action programme contains plans for ‘soft’, preventive measures but they are only explained in vague terms. Moreover, while the senior policy maker (interview) has a stated preference for ‘soft’ measures, this strategy is often criticised in the current political climate. It may be that repressive measures themselves make it more difficult to implement soft policies. Furthermore, it seems complicated to deal with two different measures that are at opposite ends of the range of possible actions. However, some attention is also given to the jihadist as an individual human being who wants to change. The action programme to combat jihadism states that returnees who are traumatised or disillusioned and want to leave the jihadist movement, can get consular assistance from Dutch embassies. However, no specific details are given of how this works in practice.

Knowing the main elements of Hayat and EXIT-Deutschland and the existing Dutch measures, we can identify which measures have not yet been applied in the Netherlands and could therefore be transferred to the Netherlands, provided other relevant requirements can also be met. The legal implications seem to be in the area of de-radicalisation, should the Dutch government decide to carry out the programmes by itself. This would also mean acting as a bridge between society and security authorities. For the rest, all other essential elements of the Hayat and EXIT-Deutschland programmes seem suitable for transfer to the Netherlands. As described in the previous paragraph, main

programme elements regarding terrorist solutions, this research recommends actively approaching returnees instead of waiting to be contacted as with the Hayat and EXIT-Deutschland programmes. The next section will determine to what extent Hayat’s and EXIT-Deutschland’s main elements can be transferred to the Netherlands to supplement existing practices and plans.

Transferability

In order to study whether the conditions in the Netherlands make it likely that a successful transfer of policies from Germany can take place, we will use the six hypotheses given by Rose (1988: 227-228). The first hypothesis states that (1) Programmes with single goals are easier to transfer than programmes with multiple goals. The main goal of the Hayat and EXIT-Deutschland programmes is to de-radicalise (in terms of ideology) radicals. Although other sub-objectives, such as reintegrating the radical into society or finding a new environment, may have to be met in order to reach the main goal, it is still a single-goal programme. The aim of the Dutch government is to reduce the risks associated with Dutch returnees from Syria (interview senior policy maker). Though the objective of the Dutch government is different from the objective of the Hayat programme, these objectives are not contradictory. In the future, the Hayat and EXIT-Deutschland objectives could be regarded as possible sub-objectives of the Dutch objective. So, based on this first hypothesis, it seems that elements of the German programmes could in principle be transferred to the Netherlands. The next hypothesis states that (2) The simpler the problem, the more likely transfer will occur. In the case of the jihadists, the problem is rather complex since there are many reasons why people go to Syria, return and de-radicalise. There is no single approach that can be used, there is no ‘one size fits all’ solution for all these individuals (interview Pannekoek). A person-centred approach seems to be the most suitable as discussed in the previous chapter. Furthermore, society has strong and diverse thoughts about returnees,
which could make it harder to integrate returnees back into society (interview senior policy maker). As the senior policy maker (interview) stated, the public and politicians demand harsh (repressive) measures which are often not the best solutions. Due to the individual approach and the different visions of the programme, it is a rather complex programme. Given the terms of this hypothesis, transfer is therefore less likely to occur.

The third hypothesis states that (3) **The more direct the relationship between the problem and the solution, the more likely it is that transfer will occur.** Since the ‘solution’ is directly aimed at and focused on the problem we can state that there is a direct relationship. Therefore, according to this hypothesis transfer is likely to occur.

Hypothesis four states that (4) **The fewer the perceived side effects a policy has, the more likely transfer will occur.** The person-centred approach used by Hayat and EXIT-Deutschland involves serious risks. These include security risks resulting from a faulty threat analysis, lack of standards and risks of aiding terrorists who play along. It could be that the radical environment of the returnee will react hostile to the de-radicalisation and disengagement programmes and their employees. This has happened to EXIT-Deutschland and its employees, although – as yet - never as direct physical attacks. Furthermore, given the political pressure to implement more harsh, repressive policies and practices the programme is likely to be criticised as being too “soft”. Linked implications for success are the repressive measures themselves, which make it more difficult to implement soft policies. Furthermore, it seems hard to deal with two different measures that are at opposite ends of the scale. All in all, there seems to be quite some side effects. Especially the security risks involved need to be question critically in order to determine to what extent civil society actors, such as Hayat and EXIT, can deal with these risks. Therefore, according to this hypothesis, transfer seems unlikely to occur. The following hypothesis states that (5) **The more information agents have about the functioning of a programme in another country, the easier it is to transfer.** Since Germany and the Netherlands are neighbours, the two
countries work together successfully on different matters such as economy, culture, and administration.\textsuperscript{16} Both countries try to stimulate good communications and attach value to maintaining a high level of trust.\textsuperscript{17} Furthermore, from my own experience while writing this research, the former head of research of Hayat and EXIT-Deutschland, Daniel Koehler, was very helpful in providing the information needed with interviews and providing literature. Therefore, gathering information from Germany and specifically from Hayat and EXIT-Deutschland seems to be easy. Moreover, most the information about the working methods of Hayat and EXIT-Deutschland do not involve confidential information. However, some methods seem deemed to be protected skills. Additionally, reducing the risk that returnees can pose in the Netherlands is also in the interest of Germany as it provides a means of monitoring returnees throughout the region. Returnees arriving in the Netherlands could also form a threat to Germany, as was the case with an attack on a Jewish museum in Belgium, which was committed by a French returnee.\textsuperscript{18} So apart from good communication and a trusting relationship, it is also in German’s own interest to have a stable neighbouring country. Therefore, in light of this hypothesis, transfer seems relatively easy to accomplish. The last hypothesis states that (6) \textit{The more easily outcomes can be predicted, the simpler a programme is to transfer}. Because they are person-centred, it is hard to predict the outcomes of the Hayat and EXIT-Deutschland programmes, since each case is different and the effect not easily measured. As stated before, each radical has different reasons for joining, returning and de-radicalising. Based on this last hypothesis, the programmes would be quite difficult to transfer.

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\textsuperscript{17} Embassy of the Kingdom of the Netherlands in Berlin, Germany (2014), \url{http://duitsland.nlambassade.org/themas} (visited on November 15th 2014).
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In conclusion, three of Rose’s six hypotheses as tested above predict that policy transfer is likely to occur or is easy to accomplish (hypotheses 1, 3 and 5). By contrast, the outcomes of the other three hypotheses indicate that it will be difficult or less likely that successful policy transfer will occur (hypotheses 2, 4 and 6). On the basis of Rose’s hypotheses the chances for successful transfer are therefore divided. If the Netherlands still wants to transfer the Hayat and EXIT-Deutschland programmes, some adjustments will be needed in order to improve the chance of success. The complexity of the problem cannot be made simpler, and hence the problems described in hypothesis two cannot be changed. However, the possible side effects discussed in hypothesis four, which are related to the (security) risks and political pressure to implement more harsh, repressive policies and practices could be dealt with. The danger posed to programme employees can be dealt with, partly by paying more attention to the issue and trying to combat it. The (security) risks can also be tried to reduce by employing experienced staff and train them well. Furthermore can a close cooperation with the central government, like the German nationwide counselling network, be helpful to deal with this problem. Especially since Hayat is a civil society organisation that is not experienced and aligned to dealing with these kind of issues. Furthermore, the political pressure can be done with the help of Stone’s remarks regarding the ‘soft’ and ‘hard’ forms of policy transfer (Stone, 2004: 546). According to Stone (2004: 556), anyone wanting to transfer policy, should first focus on the ‘soft’ forms of policy transfer, which might involve promoting norms and knowledge. This needs to be done by non-state actors who are better at influencing public opinion and policy agendas. Afterwards, the Dutch government can transfer the policy tools and structures which constitute the ‘hard’ transfer. So, non-state actors could help to change public opinion and try to reduce political pressure by focusing on less restrictive policies and practices. The designated actors would be the elected officials who took comprehensive action to set up a programme to combat jihadism, and their political parties, experts, interest groups and law
firms. These experts, interest groups and law firms are non-state actors that could play an important part in the ‘soft’ transfer of policy. A number of Dutch lawyers have already publicly criticised the more repressive plans laid out in the action programme. Other resources include the practice of partnering people of Dutch descent with those of Moroccan descent (SMN) and starting a hotline for the parents of radicalised youngsters. Moreover, the number of experts and scholars investigating the issue of jihadist returnees, and knowledge about this subject, has been increasing. According to Stone, these non-state actors are often forgotten in the policy transfer process, but they can be very influential. Asking non-state actors for help could reduce the demand for harsh, repressive measures and make it possible to overcome this major side effect. In conclusion, the biggest perceived side effect can be restricted, thereby improving the chance of successful policy transfer.

The last hypothesis that was tested with negative results was the more easily outcomes can be predicted, the simpler a programme is to transfer. The complexity of the relevant problems would seem to limit the chance of success. However, there are changes that could make it easier to predict outcomes, including, for example, using a more experienced crew and having a well-run organisation. If all policies and practices are coordinated by one institution and they have experienced staff, outcomes are more predictable, although never precisely.

So although the circumstances for successful policy transfer are not optimal they can be improved. In addition, other measures can be taken to prevent policy transfer failure. The next section will investigate these measures.

Preventing policy transfer failure

It should not be forgotten that policy transfer is not always successful. The three factors that Dolowitz and Marsh (2000: 17) cite as reasons for policy failure are uninformed transfer (not having enough information), incomplete transfer (crucial elements for success are not transferred) and inappropriate transfer (too little attention is given to the contexts of the two countries). In order to prevent these factors from happening, the following matters need extra attention: good communication with the German institutions. This can prevent uninformed and incomplete transfer. What is also required is specific and precise research regarding the crucial elements for success and an investigation of the contexts of the situations in Germany and the Netherlands. This will cost time and money but is definitely necessary in order to improve the chances for successful policy transfer.

Furthermore we should not forget to investigate the errors that have occurred in Germany, so that we can prevent them from happening in the Netherlands when their policies and practices are transferred. There are dozens of de-radicalisation projects aiming at the radical-right movements in Germany but there is no central German institution which is responsible for all radical-right issues or for coordinating all related activities (Schellenberg, 2009: 180). Various individual institutions work in their own manner, using different approaches and without coordination. It is therefore advisable to have one central organisation to coordinate all activities related to Dutch jihadists and returnees. Although this is already the task of the National Coordinator for Security and Counterterrorism21, Pannekoek (interview) explains that the different governmental institutions that are engaged in the fight against Dutch jihadists do not normally work well together. Improving cooperation with the help of the National Coordinator should be helpful avoiding this problem in the Netherlands. Obstacles to success that where identified at Hayat and EXIT-

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Deutschland in Germany, which have already been discussed, are: punishment of the drop out by their own group, society’s refusal to accept the dropout as a new person, and problems related to the protection of their own staff. Other problems have to do with the legal status of EXIT-Deutschland as a civil society organisation, which has had to hand over some jobs to the police and other agencies (such as providing a new identity and police protection). While it is important to respect the need for separation of powers, Koehler suggests giving the organisation expert witness status so that requests can be streamlined and some bureaucratic procedures can be bypassed. Also, their statements in court could be given more weight (interview Koehler). A close cooperation between the civil society organisation and the central government, like the German nationwide counselling network, can help solving this problem. However, clear agreements should be made since both institutions both should not interfere with each others work. As discussed in the previous paragraph we therefore recommend that a non-state actor be given responsibility for the transfer of projects to the Netherlands, and that they be given expert witness status. Additional, a close cooperation between the government and NGO could be helpful. Furthermore, before starting this initiative, the Dutch government should estimate their costs and available budget as precisely as possible. Although this information can easily be obtained from Hayat and EXIT-Deutschland, price differences have to be taken into account. The government must ensure that there is enough budget available to deal with the problems adequately and to employ the right people. Attention should also be given to the question of the protection of the programme’s employees.

**Conclusion**

The hypotheses formulated by Rose were used to check whether conditions in the Netherlands make it likely that a successful transfer of policies from Germany can take place. Three of Rose’s six hypotheses tested above predict that policy transfer is likely to
occur or is easy to accomplish (hypothesis 1, 3 and 5). In contrast, the outcomes of the other three hypotheses predict that it will be difficult or less likely that successful policy transfer will occur (hypothesis 2, 4 and 6). Therefore, based on Rose’s hypotheses the chances for successful transfer are mixed, and additional measures will be needed in order to improve the chances of successful policy transfer. This could be done by tackling some of the possible side effects. Steps should be taken to reduce the involved risks and the political pressure to implement only harsh, repressive policies and practices. This can be done with the help of Stone’s remarks regarding the ‘soft’ and ‘hard’ forms of policy transfer (Stone, 2004: 546). Since non-state actors are better in influencing public opinion and political agendas, these should play a part here. Furthermore a well-structured organisation is needed and the transfer and implementation of all relevant policies and practices should be coordinated by this one institution. Additional measures should be taken in order to prevent policy transfer failure. These measures include good communication with the German institutions as a means of preventing uninformed and incomplete transfer. Moreover specific and precise research regarding the main elements and investigating the contexts of Germany and the Netherlands should be part of the transfer process. Lastly the National Coordinator for Security and Counterterrorism should strengthen its role as the central organisation responsible for coordinating all activities related to Dutch jihadists and returnees and create a good and trustful relationship. All this will cost time and money but is definitely necessary in order to improve the chances for the successful transfer of policy.

Part 3: Conclusion

This chapter will answer the central research question and give some policy recommendations and practical implications of the research. Furthermore it will discuss the limitations of the research findings and discuss possible avenues for future research.
Limitations

Due to the volatility of the subject of this research, the cut-off point for new material was set on October 2014. Hence the time frame of the study is from March 2011 (begin Syrian conflict) to October 2014. This research may therefore contain outdated information. The focus of this research is on Dutch returnees. However, this does not imply that preventive measures to keep Dutch jihadists from going to Syria are not important. Continuous attention and research needs to be done on prevention. This research focuses on Dutch returnees from the fighting in Syria and disregards other countries, such as Iraq, where foreign fighters are also active. Another aspect is that not all German policies and practices were taken fully into account. Therefore, we cannot be sure that this research has investigated all actual measures or best practices, although in all likelihood the most important features have been taken into account. Lastly it should be noted that it is difficult to gain access to reliable and detailed field data regarding foreign fighters. Interviews were necessary, but even top governmental officials only wanted to be interviewed anonymously. Some of the approached governmental agencies indicated that they had a lot of data but they could not share it due to security reasons.

Answering the research question

As discussed in the introduction, this research investigates *To what extend can the main elements developed by the Hayat and EXIT-Deutschland institutions, aimed at reducing the risks posed by radicals, effectively be transferred to the Netherlands?* In order to answer this research question, 2.1, *comparing Dutch returnees and radical right members* investigated if Dutch jihadi returnees have a number of similarities with members of the German radical right and can therefore be compared. In conclusion we can state that although there are of

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course differences between the case of the German radical-right members and the case of returning Dutch jihadists, there are also a significant number of similarities. Most of the overlap relates to the question of why people feel attracted to these movements. Convictions and ideology do often not play a major role in that early phase of radicalisation. In most cases ideological radicalisation occurs during the second phase, when people are already part of the radical group. Knowing this, we can state that certain key characteristics of German right-wing radicals and Dutch returning jihadists can be compared. Thereafter in 2.2, *Main programme elements regarding terrorist solutions*, it was examined what the main programme elements of Hayat and Exit-Deutschland are. This has to be examined in order to determine if the main elements could possibly be transferred to the Netherlands. Although there is a lack of evaluative studies the Dutch government wants to transfer these programmes. Main programme elements include, among others, having a good and close relationship with the direct social environment of the radical. Person-centred approaches seem to be the most successful. This also includes creating a personal profile at the beginning of the de-radicalisation path of the programme. Moreover, strict contracts are necessary to manage mutual expectations and attention needs to be given to the background of the radical. Providing returnees with alternatives is a key element for diminishing the danger that somebody could be for society. Part two ended with 2.3, *transferability*, investigating whether Hayat’s and Exit-Deutschland’s main elements successfully can be transferred to the Netherlands. In order to check if the conditions in the Netherlands make it likely that a successful transfer of policies from Germany can take place, the hypotheses given by Rose were used. According to Rose (1988: 227-228) the following six hypotheses are of interest:

1. Programmes with single goals are easier to transfer than programmes with multiple goals.
2. The simpler the problem, the more likely transfer is to occur.
3. The more direct the relationship between the problem and the solution, the more likely it is that transfer will occur.

4. The fewer the perceived side effects a policy has, the more likely transfer will occur.

5. The more information agents have about the functioning of a programme in another country, the easier it is to transfer.

6. The more easily outcomes can be predicted, the simpler a programme is to transfer.

Three of the Rose’s six hypotheses tested suggest that policy transfer is likely or can be easily accomplished (hypotheses 1, 3 and 5). In contrast the outcomes of the other three hypotheses indicate that it will be difficult or less likely that successful policy transfer will occur (hypotheses 2, 4 and 6). Therefore, based on Rose’s hypotheses the chances for successful transfer are mixed, and additional measures will be needed in order to improve the chances of successful policy transfer. This could be done by tackling some of the possible side effects. Steps should be taken to reduce the political pressure to implement mainly harsh, repressive policies and practices. This can be done with the help of Stone’s remarks regarding the ‘soft’ and ‘hard’ forms of policy transfer (Stone, 2004: 546). Since non-state actors are better in influencing public opinion and political agendas, these should play a part here. Furthermore a well-structured organisation is needed and the transfer and implementation of all relevant policies and practices should be coordinated by this one institution. The National Coordinator for Security and Counterterrorism therefore needs to strengthen its role as the central organisation responsible for coordinating all activities related to Dutch jihadists and returnees.

In conclusion, although there are certainly differences, important main elements of the radicalisation processes of German right-wing radicals and Dutch returning jihadists are comparable. Main elements were considered for transfer from Germany to the Netherlands, and not the complete instrumentation for implementation. That instrumentation should not
be transferred because of the different social, political and legal environment in the Netherlands. The conditions for successful policy transfer are not optimal but some additional measures can improve the chance of success. So in order to answer the research question: *To what extend can the main elements developed by the Hayat and EXIT-Deutschland institutions, aimed at reducing the risks posed by radicals, effectively be transferred to the Netherlands?* It can be concluded that several of the main elements of HAYAT and EXIT-Deutschland can be transferred, but not all of them. Therefore some adjustments are necessary. This research recommends establishing a Dutch programme based on elements of Hayat and EXIT-Deutschland, but focusing on (active) *disengagement* instead of (passive) *de-radicalisation*. In the future, when the organisation is more well-established, it could evolve into a de-radicalisation programme. This research also recommends setting up an *NGO with expert witness status* so that requests can be streamlined and some bureaucratic procedures can be bypassed. Also, their statements in court could be given more weight. This would also be better for building a relationship of greater trust between the radical and the organisation. A close cooperation between the NGO and central government will also be necessary. Since the successful monitoring of jihadists and returnees depends on the cooperation of their direct environment, we should not discourage people from approaching the Dutch authorities. Implementing only repressive measures not only discourages the social environment of the radical from cooperating with the state, but has even been shown to have exactly the opposite effect.

This research foresees a *voluntary policy transfer*. However, since the returnee problem is a European problem, an *indirect coercive transfer* might also come into play. It is hoped that this paper can help to promote the ‘soft’ form of policy transfer, and convince people that a mentality change is necessary in order to encourage the acceptance of person-centred approaches. It may also help to convince the government that it should move away from its focus on harsh, repressive measures, which is the result of political and societal
pressure, although the action programme combating jihadism has mentioned preventive/individual centred elements. If this mentality does not change there is a significant chance of policy failure and the proposed creation of an exit and counselling facility will not be feasible since the repressive measures themselves make it more difficult to implement soft policies. Furthermore, it seems complicated to deal with two different measures (soft and hard) at the same time since they are at opposite ends of the range of potential actions. Hopefully this research may help to remove one of the biggest obstacles to successful de-radicalisation or disengagement, which is society’s refusal to accept the dropout’s return to society.

Possible avenues for future research

During this research it became clear that several subjects are under-researched. There is a lack of evaluative studies regarding best practices, historical comparative research, a lack of (state of the art) research regarding policy transfer and additional research should be carried out to determine to what extent the measures taken and planned by the Dutch government contravene democratic principles and the separation of powers. We understand that there are significant risks involved and that this is a politically sensitive issue, but at first glance, some measures seem inconsistent. Furthermore, more evaluative studies are needed in order to determine which methods of de-radicalisation and disengagement are best practices. Other countries with experience of de-radicalisation and disengagement programmes, such as those in Scandinavia and the United Kingdom, could be evaluated. Also additional research could be done to what extent these best practices are transferable to other countries. The issue of transferability is under researched and deserves more attention in order to determine if best practices abroad can be implemented back home. Moreover, more historical comparative research could be done regarding the negative attitudes towards the jihadists. If we want to know whether the returning jihadists really
form a threat to Dutch society, we have to take an objective, nuanced view of the matter. Events such as 9/11 should not be our only framework; we should also look at other situations. Foreign fighters are not a new development in the world. Ernest Hemingway wrote about the ‘heroes’ who were foreign fighters in Spain against dictator General Francisco Franco. During that period tens of thousands of European anarchists, communists, and socialists went to Spain to join the international brigades fighting in the Spanish Civil War (Bakker, et al, 2013: 2). About 700 Dutchmen and women went to Spain to fight against the enemy on the political right. During that period, the Dutch government was afraid of what would happen when the fighters returned. They were afraid that the fighters would radicalise while in Spain and therefore the government also opposed recruitment in the Netherlands. In 1937 a law was introduced that would make Spanish returnees stateless; their passports were confiscated and they could not engage in politics. It was not until the 1970s that these Spanish veterans got back their Dutch nationality. The question that arises here is to what extent did these Spanish returnees actually present a threat to Dutch society? Or do we now consider some of those returnees as heroes who fought fascism during World War II? Perhaps further comparative research regarding jihadists could create a better understanding of their cause in Dutch society. Finally, it would be interesting to study the extent to which an exclusive focus on repressive measures affects the willingness of the immediate personal environment of a jihadist to cooperate with the government or the entity responsible for carrying out a disengagement programme.

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Bibliography

Abied, A. (2014), ‘Syrie, politieke impasse, onmenselijke chaos: is er ook een oplossing?’,

AD.nl (2014),


Speckhard, A. (2010), Prison and Community Based Disengagement and De-Radicalization Programs for Extremists Involved in Militant Jihadi Terrorism Ideologies and Activities, Pre-publication Version: Conflict and Terrorism.


**Interviews with**

- Donselaar, Dr. J.G. van., Associate Professor – Scientific Director for the Institute of Public Administration, Leiden University (April 7th 2014).

- Koehler, D., former Director of Research Operations at the Institute for the Study of Radical Movements (April 24th 2014).

- Pannekoek, M., Researcher at the Ministry of Foreign Affairs and analyst of the strategic information centre of the Royal Netherlands Marechaussee (April 29th 2014).

- Senior policy maker of the Ministry of Security and Justice (June 3rd 2014).