Two paths against terrorism: Comparing repressive and deradicalization approaches in Indonesia and Malaysia

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Abstract

Terrorism is a growing global threat, including in Southeast Asia. Indonesia and Malaysia, two countries with social diversity and a history of ideological conflict, face similar challenges in combating terrorism, but adopt different policy approaches. This paper aims to compare repressive and deradicalization approaches to counterterrorism in the two countries, focusing on two main questions: what are the legal frameworks and policies for counterterrorism in Indonesia and Malaysia, and what are the differences in the repressive and deradicalization approaches implemented by each country. The research method used is normative legal research with a comparative legal approach, using primary legal sources in the form of laws and government regulations, as well as secondary legal sources such as scientific literature, research reports, and case studies. The results of the study indicate that Indonesia balances repressive and deradicalization approaches through institutions such as Densus 88 and BNPT, while Malaysia predominantly uses a repressive approach with legal support such as SOSMA, although it has begun to pioneer rehabilitation programs. These differences in approach reflect the political-legal orientation of each country, as well as sensitivity to human rights issues. In conclusion, the effectiveness of counterterrorism requires a balance between security measures and the protection of civil rights, as well as continuous evaluation of the impact of deradicalization policies on social reintegration and community cohesion. This study recommends the need for a holistic approach that not only suppresses the symptoms of terrorism, but also addresses its ideological and structural roots in the long term.

Keywords

Terrorism, Comparative Law, Repressive Approach, Deradicalization

Introduction

Terrorism has evolved into a significant transnational threat, impacting global security and stability through the emergence and proliferation of international terror networks such as Al- Qaeda and the Islamic State (ISIS). These organizations utilize modern communication strategies and ideologies to recruit individuals from diverse

backgrounds, including in Southeast Asia, where they have established operational footholds and radicalized segments of the population.

The psychological tactics used by terror groups, including the manipulation of religious narratives and the glorification of martyrs, are crucial to their recruitment efforts. Research shows that groups like ISIS and Al- Qaeda exploit socioeconomic grievances as a means to attract marginalized individuals who feel disconnected from mainstream society [1], [2]. For example, the socio-economic backgrounds of many individuals involved with terrorist groups in Kuwait highlight an important theme: social marginalization significantly contributes to recruitment into terrorism, especially when these narratives resonate with personal experiences of injustice and powerlessness. This dynamic is also evident in Southeast Asia, where inequalities in wealth and education create fertile ground for radicalization [3].

The strategic importance of Southeast Asia as a breeding ground for terrorist networks cannot be underestimated. The region's geopolitical significance makes it vulnerable to recruitment and operational activities by international terrorist organizations. Historically, this has allowed groups such as Abu Sayyaf and Jemaah Islamiyah to establish themselves as local affiliates of larger global networks [4]. Research suggests a shift in terror dynamics in Southeast Asia, particularly as ISIS views the region as a new front for its jihadist agenda, following the weakening of its core territory in the Middle East [5]. The potential for further radicalization in Southeast Asia remains, particularly given the complex socio-political landscape and persistent sentiments of resistance to perceived state-led repression [6].

Furthermore, the interconnectedness of local and global jihadist ideologies forms a crucial aspect of the appeal these networks retain in Southeast Asia [7]. Al- Qaeda 's ties with local terrorist factions are strengthened through shared ideologies and shared grievances against the West, strengthening its role in the region's security landscape [8]. Despite efforts by Southeast Asian states to counter this influence, a deep understanding of the local context remains a challenge for security operations.

The growing threat of terrorism in Southeast Asia, particularly involving Indonesian and Malaysian citizens, is a serious concern for the government and the public. This threat is made even more apparent by the evolving nature of terrorism in the region, fueled by local dynamics and transnational networks such as ISIS and Jemaah Islamiyah (JI).

Indonesia is at the forefront of this problem, having experienced a series of high-profile terrorist attacks, which prompted the government to adopt more repressive counter-terrorism policies. Kusuma et al. noted that Indonesia's participation in the "war on terror" was influenced by domestic terrorist incidents, which had increased public and government support for stringent measures against the perceived threat [9]. This is also accompanied by an increase in cases of organized violence, as highlighted by Prabowo et al. , who stated that terrorist activities in Indonesia are increasingly organized and brutal, often targeting civilians and thus threatening national stability

[10]. The presence of ISIS-linked networks has facilitated a worrying trend of more coordinated and sophisticated terror plans.

In a regional context, Malaysia faces similar challenges related to the impact of terrorism, which is closely linked to activities in Indonesia. The proximity of these two countries exacerbates the threat; as Wirawan's research explains, transnational crime, including terrorism, not only threatens national sovereignty but also requires a cooperative defense strategy between Indonesia, Malaysia, and the Philippines [11]. These cross-border dynamics are crucial because increased terrorist activity in one country can lead to negative security perceptions and decreased tourism in neighboring countries [12].

Furthermore, the socio-political landscape in Indonesia is marked by a worrying trend of radicalization across various demographics, including women and youth, which requires appropriate intervention. Research shows that the role of women in terrorism has evolved from passive supporters to active participants, adding to the complexity of counter-terrorism efforts in the region [13]. This evolution highlights the changing face of radicalization and requires a deeper understanding of the motivations behind such involvement [14].

Moreover, the challenges posed by terrorism are exacerbated by the ideological dimensions that motivate these acts of violence. Bela et al. discuss the roots of terrorism through the lens of Islamic movements in Indonesia, illustrating that the interaction between belief and ideology significantly fuels radical sentiment among some groups within the population [15]. Understanding the ideological framework that underpins terrorism is crucial to understanding how transnational networks recruit and mobilize individuals, particularly in the context of organizations such as ISIS [16].

In contrast to purely repressive measures, there is a growing recognition of the need for a comprehensive counter-radicalization strategy that encompasses not only law enforcement but also community engagement and rehabilitation programs. The Indonesian government's pentahelix model , which involves various sectors of society, aims to effectively address the root causes of radicalization and terrorism [17]. The emphasis on socio-economic factors, as outlined by Lasmawati et al. , point to the need to address grievances that may lead individuals to accept extremist ideologies [18].

Indonesia and Malaysia's responses to acts of terrorism generally reflect a repressive framework. This approach is evident in the use of law enforcement agencies specifically tasked with counter-terrorism efforts. In Indonesia, for example, Densus 88, a special counter-terrorism unit established within the National Police, plays a crucial role in apprehending individuals deemed to pose a threat to national security. Research suggests that the formation of special units such as Densus 88 was a direct response to the rise in acts of terrorism, particularly following incidents such as the Bali Bombings in 2002, which highlighted the country's vulnerability to terrorist threats [19], [20].

This government's strategic orientation toward a law enforcement-focused model typically involves the arrest, detention, and prosecution of individuals suspected of terrorism-related offenses. Such repressive measures are often justified through a national security narrative, which portrays terrorism as an existential threat requiring a stringent response [21], [22]. This strategy is characterized by a combination of legislative frameworks, such as the Anti-Terrorism Law in Indonesia, which provides a legal basis for extensive surveillance and detention in certain circumstances [23].

While law enforcement remains the cornerstone of this strategy, there is recognition of the limitations of purely punitive measures. Experts argue that the structural challenges faced in addressing terrorism also require an awareness of the broader socio-political context that contributes to radicalization [24]. The presence of social inequality and perceived injustice can exacerbate sentiments leading to radicalization, highlighting the need for a dual approach that includes preventive measures alongside law enforcement.

Furthermore, critics of the repressive approach highlight its ineffectiveness in addressing the underlying issues that give rise to terrorism. For example, while Densus 88 has been successful in disrupting terrorist networks, it lacks a robust deradicalization strategy that addresses the ideological and psychological dimensions of terrorism. Without parallel efforts aimed at building community resilience and addressing the root causes of radicalization, law enforcement measures, while necessary, may only provide a temporary solution to the persistent threat of terrorism.

Over the past decade, attention has grown to deradicalization programs as a more refined and humane approach to countering terrorism. These programs include initiatives involving not only state action but also support from civil society organizations, religious leaders, and correctional institutions. While their effectiveness remains debated, these programs demonstrate a shift from traditional punitive measures to more rehabilitative strategies.

One prominent example of a deradicalization program is in Indonesia, where the National Counterterrorism Agency (BNPT) plays a crucial role. This agency implements a comprehensive initiative aimed at rehabilitating convicted terrorists through education, psychological counseling, and community engagement to reduce the relapse rate. [25]. Research within Indonesian prisons emphasizes the importance of ideological and psychological interventions, suggesting that addressing mental health issues before ideological discussions can increase the effectiveness of these programs [26]. Additionally, evaluations of programs such as the Terrorism Client Guide at Surakarta Prison highlight the need for strategies tailored to the unique backgrounds and motivations of prisoners [27].

Discussions about whether programs should be tailored to the user or context further emphasize the importance of understanding the risk factors associated with violent extremism [28]. Experts suggest that programs that are sensitive to local socio-cultural dynamics show promise in diverting individuals from radical ideologies [29].

Collaboration between various stakeholders including government agencies, non-governmental organizations, and community leaders is also considered vital to the success of deradicalization efforts [30], [31].

In addition to state-led initiatives, the involvement of civil society organizations is crucial in deradicalization programs. These organizations leverage community relationships to facilitate dialogue and understanding, thereby reducing the environment conducive to radicalization [32]. Studies show that effective deradicalization includes social reintegration strategies involving family and community members, confirming that comprehensive support networks are crucial for successful interventions [33]. Additionally, engaging former extremists in educational activities has been explored as a potentially effective method to counter radical narratives [34].

However, the challenges faced by deradicalization programs cannot be ignored. Issues such as overcrowding in correctional institutions, limited funding, and the stigma attached to former extremists pose significant obstacles to successful implementation [35]. Therefore, although these programs show potential in preventing relapse and promoting peace, they must adapt to social changes and involve a wide range of stakeholders to achieve maximum impact [36] , [37].

Although numerous studies have addressed counterterrorism in general at both the global and national levels, studies systematically comparing repressive and deradicalization approaches between Indonesia and Malaysia are still relatively limited, particularly those assessing their effectiveness and impact on the reintegration of former terrorists into society. A comprehensive understanding of these differences in approach is crucial for formulating policy strategies that adapt to the threat dynamics and socio-political characteristics of each country. Against this bakground, this paper will address two main questions: first, what are the legal and policy frameworks for counterterrorism in Indonesia and Malaysia? Second, what are the differences between the repressive and deradicalization approaches implemented by the two countries, and how do these impact the effectiveness of counterterrorism efforts and the social reintegration of perpetrators?

Method

This article uses a normative legal research method with a comparative law approach [38], which aims to analyze the differences and similarities in the legal framework and counter-terrorism approach between Indonesia and Malaysia. The data used consists of primary legal sources such as laws, government regulations, and official policies related to counterterrorism in both countries, as well as secondary legal sources in the form of scientific literature, research reports, and relevant case studies to enrich the analysis and provide empirical context for the comparisons made.

Results and Discussion

Definitions of terrorism

The concept of terrorism and its definitional landscape are characterized by significant variation at both the national and international levels. The lack of a uniform definition complicates efforts to combat terrorism effectively. Different countries and international organizations have proposed their own definitions, leading to diverse interpretations based on different political, cultural, and social contexts. This definitional ambiguity poses challenges not only to legal approaches to counterterrorism but also to the international community seeking to develop a cohesive counterterrorism policy.

The absence of a universally accepted definition of terrorism has significantly impacted the legal framework in various jurisdictions. As outlined by Irfandi et al. , the complexity in reaching a consensus on the definition of terrorism stems from differences in political ideologies and social contexts, which encourage diverse interpretations of what constitutes a terrorist act [39]. This sentiment is also reflected in several studies showing that various definitions encompass different acts and methods and reflect the historical and socio-political currents of the societies that formulate them [40]. Mahmood notes that despite numerous international conventions aimed at formulating a comprehensive definition of terrorism, reliance on diverse interpretations continues to complicate a consistent legal response [41]. This inconsistency is further emphasized by the trends observed by Bitton and Silawi , who highlight that the intrinsic motivations and resulting impacts of terrorist acts can significantly alter public perceptions and classifications.

International bodies such as the United Nations (UN) have attempted to standardize the definition of terrorism; however, their efforts have often fallen short of universal acceptance, leading to a legal framework that is fragmented and susceptible to varying interpretations. Wendelberg notes the growing recognition of the need for an agreed-upon framework to define radicalization and terrorism, pointing out that current definitions often lack clarity for effective legal implementation [42]. Imran and Nordin further highlight the challenges surrounding the development of a universally accepted definition, arguing that varying interpretations of international law complicate domestic counter-terrorism efforts [43].

Additionally, scholars such as Abuloye and Kolade emphasize the importance of recognizing the social and political catalysts behind terrorism, suggesting that a single definition fails to encompass its complexity. They advocate for a core legal definition that combines criminal law with civil rights, enabling states to navigate the definitional confusion while formulating effective policies against terrorism [44]. This perspective is crucial, as the socio-cultural dimensions of terrorism often determine public sentiment and legislative action within states [45].

Recent trends in addressing radicalization demonstrate growing recognition of the integral role played by communities, religious leaders, and education in prevention strategies. While recognition of these factors has made significant progress, their implementation within national policy frameworks remains partial and inconsistent.

First and foremost, community engagement has emerged as a crucial strategy in reducing radicalization. Research shows that community leaders and grassroots organizations are vital in identifying and preventing radical ideology. For example, Lösel et al. (2018) identified various protective factors against extremist attitudes, suggesting that self-control and compliance with the law among individuals can reduce extremist behavior across the ideological spectrum [46]. Furthermore, Windiyawati (2021) emphasized the importance of community leaders in educating the public about radical ideologies, strengthening their role in building understanding of the dangers associated with radicalization [47]. Thus, local community dynamics, along with structured educational initiatives, can create networks that are resilient to the influence of extremist ideologies.

Additionally, involving religious leaders in prevention strategies is crucial due to their influence and standing within the community. Zaduqisti et al. (2020) emphasize how Islamic political moderation encourages tolerance and reconciliation, which can significantly strengthen community resilience against radical narratives [48]. This perspective is also supported by Faizah et al. (2021), who argue that religious education lecturers can instill moderate Islamic values in students, thereby increasing the broader public's understanding of radicalization and promoting a peaceful interpretation of Islam [49]. This insight suggests that integrating religious education into counter-radicalization efforts can create a more tolerant society, ready to effectively reject extremist ideologies.

Educational programs also play a crucial role in addressing radicalization, particularly with a focus on curriculum reforms that promote critical thinking and understanding of religious teachings. Qadri, et al. (2024) describe how an effective pedagogical approach can transform students into ambassadors of peace, leveraging their education as a shield against radicalization [50]. This concept is in line with the findings of Widjaja et al. (2022), who recommend early prevention efforts in educational institutions to support ideologies that promote harmony and reduce vulnerability to radical influences [51]. Therefore, integrating counter-radicalization themes into the educational framework strengthens an informed and resilient youth demographic.

While there has been progress in recognizing these roles, the integration of community and educational perspectives into national policy remains fragmented. Policies such as the UK's Prevent strategy have attempted to integrate community-based approaches; however, this strategy has faced criticism for its emphasis on surveillance rather than genuine community engagement [52]. This mismatch highlights the need for better collaboration between law enforcement and community organizations to ensure a more cohesive and effective response to radicalization.

Legal arrangements and policies for counterterrorism

Indonesia

Law No. 5 of 2018, which amended Law No. 15 of 2003 concerning the Eradication of Criminal Acts of Terrorism, is a significant legislative response to the development of terrorism. This law expands the definition of terrorism, includes additional criminal acts, and strengthens the government's investigative and preventive powers. This reform is crucial in the context of combating not only traditional forms of terrorism, but also new threats such as cyber terrorism, which are increasingly prominent in our digital age [53].

The expanded definition in Law No. 5 of 2018 emphasizes that terrorism is not only a crime against humanity, but also a direct threat to national sovereignty and global peace [54], [55]. This redefinition is in line with the international perspective that recognizes terrorism as a complex and multifaceted phenomenon that undermines the established social order and civil rights. For example, terrorism is characterized by acts intended to instill fear or coerce civilians, which are related to various motives including ideological, political, and security [56], [57].

Furthermore, this law enhances the state's role in prevention and rehabilitation initiatives aimed at deradicalization. This proactive stance is reflected in initiatives targeting known terrorist organizations, emphasizing the importance of addressing the underlying social and psychological factors that contribute to radicalization [58], [59]. The implementation of deradicalization programs as part of the government's broader counter-terrorism strategy reflects a deeper understanding of terrorism as a social problem that requires a holistic solution.

Law No. 5 of 2018 also marks a significant shift towards increased collaboration between law enforcement agencies and strengthening the legal framework for counterterrorism. This law mandates the introduction of stricter measures to track and prosecute terrorist financing, which has been identified as a critical element in the operational capabilities of terrorist groups [60]. Without addressing the financial networks that support these groups, the fight against terrorism remains fundamentally hampered.

It is important to note that this law affirms Indonesia's commitment to aligning its counter-terrorism policies with international norms while recognizing the need for responses tailored to local contexts [61]. This alignment facilitates international cooperation in combating terrorism, while raising questions regarding the scope and application of national laws, particularly regarding human rights considerations and the potential for abuse of government power in enforcing counter-terrorism measures [62]. Balancing security measures with civil liberties remains a pressing challenge expressed through various discussions in global counter-terrorism dialogues [63].

Law (AML), specifically Law No. 8 of 2010, plays a crucial role in combating terrorism financing in Indonesia by categorizing funds derived from terrorist activities as proceeds of crime subject to money laundering sanctions. The legal framework provided by this law aligns with global standards established by international organizations such as the

Financial Action Plan. Task Force (FATF), emphasizes an integrated approach to combating financial crime at the national and international levels [64]. TPPU plays a vital role in tracking and dismantling networks that finance terrorism, ensuring that financial flows are monitored and illicit sources are identified and prosecuted, thereby strengthening national security and disrupting the financial operations of terrorist organizations [65].

Alongside the TPPU (Money Laundering) Act, the Intelligence Law (Law No. 17 of 2011) provides crucial support through the collection and processing of intelligence information related to potential terrorist threats and financial crimes. This law facilitates collaboration between various intelligence and law enforcement agencies, enabling the sharing of critical data that enhances the effectiveness of counterterrorism efforts (Shah, 2021). The symbiotic relationship between the Intelligence Law and the TPPU is clear, as the intelligence collected can provide information for investigations under the TPPU Act, enabling authorities to establish links between financial activities and terrorist acts, which is crucial in expediting investigations and increasing prosecution rates (Ginting et al., 2011). et al. , 2024).

The implementation of these laws must be accompanied by robust compliance mechanisms within financial institutions to effectively prevent and detect money laundering and terrorist financing. As outlined in the international framework, financial institutions are encouraged to develop robust compliance programs that comply with domestic regulations and align with international standards [66]. These mechanisms should be able to identify suspicious activity that could indicate money laundering or terrorist financing, thereby contributing to the larger goal of protecting the financial system [67]. The proliferation of anti-money laundering (AML) regulations reflects a global consensus on the need to address these interrelated issues comprehensively, ensuring that both the domestic and international financial landscapes remain safe from exploitation by criminal enterprises.

The Densus 88, the National Counterterrorism Agency (BNPT), and the Indonesian National Armed Forces (TNI) have distinct but interconnected roles within Indonesia's counterterrorism framework. Each entity contributes through specific functions targeting terrorism while navigating the legal, social, and political landscape.

Densus 88 serves as a dedicated counter-terrorism unit under the National Police, whose primary focus is operational response to terrorist activity. This unit plays a significant role in counter-terrorism operations and is designed to react quickly to threats. The formation of this unit reflects the government's strategy that recognizes the complexity of the terrorist threat in Indonesia, emphasizing the need for specialized law enforcement capabilities [68]. Furthermore, the integration of Densus 88 within a broader framework involving the National Counterterrorism Agency (BNPT) and other security entities allows for a more comprehensive approach to countering terrorism (Paikah, 2019).

The BNPT integrates intelligence, preventive measures, and community engagement to formulate counter-terrorism strategies. Its mandate includes not only direct responses such as Densus 88, but also preventive measures through deradicalization programs and counter-radicalization efforts [69]. The establishment of this institution as a non-ministerial institution under the President indicates its crucial organizational position, responsible for coordinating national counter-terrorism efforts (Paikah, 2019). In addition to its strategic framework, the BNPT actively collaborates with entities such as the Indonesian National Armed Forces (TNI) to address terrorism-related situations, including threats from armed criminal groups (KKB) and other terrorist activities in regions such as Papua [70] , [71].

The role of the TNI is seen in its capacity to engage in operations that complement police activities, particularly in situations where the terrorist threat rises to a level that exceeds the jurisdiction of civilian law enforcement. Legal reforms in Indonesia allow the TNI to participate in counter-terrorism under strict conditions aimed at maintaining public order while adhering to democratic principles [72]. The TNI's evolving role in counter-terrorism illustrates the need to balance military intervention with civil liberties, as public support varies [73].

The collaborative dynamics among these three entities — Densus 88, BNPT, and the TNI—illustrate a multifaceted approach to counterterrorism that is crucial for Indonesia. This synergy ensures adaptation to various threats while addressing the social and legal frameworks that govern their operations, reflecting an integrated national security strategy (Masyhar & Emovwodo , 2023).

Malaysia

Security Offenses (Special Measures) Act 2012 (SOSMA) and the Prevention of Terrorism Act 2015 (POTA) constitute the key legislative frameworks in the Malaysian legal system, designed primarily to combat terrorism and safeguard national security. SOSMA was enacted following the repeal of the Internal Security Act (ISA) 1960, in response to widespread public criticism of the ISA and marked a shift towards a more structured approach in managing security offenses while attempting to balance civil liberties [74]. These laws give the government broad powers to detain individuals, allowing pre-charge detention periods of up to 28 days without formal charges, which raises serious concerns regarding potential abuse and human rights violations [75].

POTA is specifically aimed at preventing acts of terrorism and expediting the prosecution of individuals involved in terrorism-related activities. This law allows for the monitoring and interception of communications, which is considered essential for the timely prevention of terrorist activities. Both SOSMA and POTA emerged in the context of growing concerns about terrorism, particularly after the September 11 attacks, which highlighted their crucial role in national security strategy [76].

Although both laws claim to be effective in combating terrorism, their practical implementation has faced substantial criticism. Concerns primarily revolve around the

impact of these laws on civil liberties, public accountability, as well as issues of arbitrary detention and potential miscarriages of justice. The definitions used in these laws are often criticized for being too broad, which could lead to abuse and unjust detention under the pretext of national security [77]. Critics argue that such laws could undermine democratic principles and erode the rule of law by allowing the disregard of established legal norms [78].

The establishment of SOSMA and POTA also reflects a broader adjustment in government policy designed to enhance public safety while navigating the complexities of human rights compliance. The challenge is to strike a balance between effective counter-terrorism measures and the protection of fundamental freedoms (Zahari et al., 2023). Malaysian society continues to be under pressure to reform this law to better align it with international human rights standards while effectively addressing the threat of terrorism.

In managing terrorism in Malaysia, the Royal Malaysian Police's Special Branch plays a crucial role, particularly in the detection, prevention, and arrest of suspects. The organization operates through specialized units, including the Criminal Investigation Division and the Special Branch Unit, which focuses on countering violent extremism. Collaboration between these units and other government agencies has proven effective in thwarting numerous plots at their early stages, reflecting a strong commitment to national security (Ismail et al. et al. , 2023; Othman et et al. , 2023).

In addition, the State Safety Council (MKN) serves as the central coordinating body for addressing national security threats, including terrorism, by bringing together various ministries and agencies within a cohesive framework. This council is crucial for facilitating cooperation between law enforcement agencies, ensuring a coordinated response to security threats [79]. The establishment of the legislative framework, particularly the Security Offenses (Special Measures) Act (SOSMA) and the Prevention of Terrorism Act (POTA), highlights the government's commitment to counter-terrorism, although these laws have raised concerns regarding civil liberties [80].

The Ministry of Home Affairs (KDN) also makes significant contributions to counterterrorism efforts through initiatives such as deradicalization programs designed to rehabilitate former terrorists. These programs are crucial for reducing radicalization within communities and ensuring that individuals with extremist backgrounds can be reintegrated into society without posing a further threat. Addressing radicalization at the grassroots level is crucial for long-term security and community resilience.

Comparative Analysis

An examination of how Indonesia and Malaysia have handled terrorism reveals stark differences, particularly in terms of detention powers, judicial process, access to legal aid, and accountability of law enforcement. Malaysia has implemented stricter laws regarding the detention of terrorist suspects, granting authorities broader powers to detain individuals without trial under certain laws such as the Security Offenses (Special

Measures) Act 2012. This law has often been criticized for potentially violating civil liberties, allowing for prolonged periods of detention without formal charge, raising concerns about due process and the right to a fair trial [81].

In contrast, Indonesia's approach reflects a more open justice system, although it is not without its shortcomings. Indonesia uses Law No. 15 of 2003, which defines terrorism and outlines procedures for dealing with suspects (Hasibuan & Tijow, 2024). Despite this legislative framework, law enforcement often suffers from shortcomings, including rights violations that may occur during detention, as seen in some exceptional cases where suspects may not be detained in accordance with due process [82]. This suggests a tension between the need for security and the upholding of individual rights in both jurisdictions.

Access to legal aid also varies significantly between the two countries. In Malaysia, legal aid is often limited in terrorism-related cases, which can exacerbate difficulties for those detained under strict anti-terror laws (Hasibuan & Tijow, 2024). Indonesia, on the other hand, has made efforts to ensure the availability of legal counsel for suspects, in line with broader initiatives to reform the judicial process. However, the effectiveness of this legal aid system in practice remains a matter of concern, with numerous reports indicating significant gaps in resources and support for defendants facing terrorism charges (Paikah, 2019).

Law enforcement accountability also differs markedly. In Malaysia, there is ongoing debate about the effectiveness of oversight of law enforcement, particularly regarding detention without trial (Bardi, 2023). Critics argue that these practices create an environment in which law enforcement can operate with relative impunity, impacting public trust in state institutions. Indonesia faces similar challenges; although some accountability mechanisms have been established, such as the National Police's counter-terrorism unit, questions continue to be raised about their overall effectiveness and the potential for corruption or abuse within the framework [83].

Deradicalization approaches in Indonesia and Malaysia show significant differences in their focus and implementation strategies, reflecting the unique socio-cultural and political contexts of each country. In Indonesia, deradicalization efforts primarily emphasize ideological development, utilizing the expertise of religious leaders, and involving former terrorists in the rehabilitation process. This ideology-focused approach aims to shape transformations in the beliefs and attitudes of individuals formerly affiliated with militant groups. The National Counterterrorism Agency (BNPT) oversees these efforts, employing a robust strategy that includes isolating inmates from other militant elements and providing incentives for participation in deradicalization programs. The importance of involving religious leaders is emphasized because they lend credibility to the process, enabling deeper engagement with the ideology underlying radicalization.

In contrast, Malaysia's strategy leans more toward social rehabilitation, with a strong emphasis on education and family engagement programs. The Malaysian model seeks to integrate former extremists into society through a holistic framework that prioritizes social integration and community support. This family-focused approach creates a more supportive environment for former militants, addressing the social dynamics that can lead them to relapse into extremism. Programs such as counseling for family members and community engagement activities are the cornerstone of Malaysia's counter-radicalization strategy, designed to create an atmosphere conducive to reintegration.

The differences between these approaches reflect broader ideological and operational priorities in addressing radicalization. The Indonesian model, characterized by collaboration with civil society, allows for more flexible engagement that encompasses community-based interventions and religious discourse. Meanwhile, Malaysia's focus on educational outreach and family engagement emphasizes prevention tactics that address potential triggers of radicalization within personal and social networks, rather than solely focusing on individual ideological change.

The differing emphases in these strategies may also stem from the historical context of terrorism in each country. While Indonesia has faced significant challenges from groups like Jemaah Islamiyah and has developed complex relationships with community leaders as part of its response, Malaysia's less violent extremist landscape has encouraged strategies that combine educational initiatives with a community resilience framework. Thus, both countries demonstrate diverse methodologies tailored to their specific challenges, highlighting the complexity of countering violent extremism across Southeast Asian contexts.

Malaysia's counter-terrorism strategy is characterized by an organized and centralized system of rehabilitation centers. The government has implemented a comprehensive program aimed at reintegrating former terrorists into society. This systematic approach ensures that rehabilitation focuses not only on the individual, but also involves the family and community, highlighting the importance of social support in the deradicalization process. This model effectively combines psychological support and civic education, fostering a sense of belonging and acceptance in society, which is crucial in reducing recidivism rates among former militants [84].

Furthermore, Malaysia's emphasis on supportive community networks during the reintegration phase is significant. This community involvement not only helps provide emotional and social support, but also counteracts the isolation that former combatants often experience. The focus on a comprehensive rehabilitation strategy sets a precedent that can be emulated by other countries facing similar terrorism issues [85].

In contrast, Indonesia's approach to counterterrorism is characterized by a transparent judicial system and an emphasis on accountability, particularly after the 2002 Bali bombings, which sparked significant legal reforms. The Indonesian government revised its anti-terrorism law, allowing law enforcement to take proactive measures against

terrorist activities while ensuring that these actions are overseen by the judiciary, thereby promoting accountability among security agencies [86] , [87].

In addition, Indonesia's unique model involves engaging Islamic mass organizations and former terrorists in educational initiatives aimed at countering radical ideology. Programs designed to engage these groups in community outreach and educational campaigns serve to dismantle extremist narratives and foster a more nuanced understanding of Islam among the public. This engagement strategy has proven effective in providing an authentic voice against radicalization, demonstrating the collaborative efforts between the state and civil society in combating terrorism [88] , [89].

Furthermore, the implementation of deradicalization programs in Indonesia, which involve Muslim scholars and socio-religious leaders in the rehabilitation process of former militants, emphasizes the crucial role of religious community leaders in developing counternarratives to aggressive jihadist rhetoric. Initiatives focused on reconciliation meetings and discussions among diverse groups allow for a deeper understanding at the community level about terrorism and radicalization, which is crucial for long-term stability.

Conclusion

Based on a comparative analysis of the legal frameworks and counter-terrorism policies in Indonesia and Malaysia, it can be concluded that both countries face similar challenges in addressing the threat of terrorism. However, the differences in their approaches reflect their respective political-legal orientations and social conditions. Indonesia places greater emphasis on a deradicalization strategy integrated with a repressive approach through institutions such as the National Counterterrorism Agency (BNPT) and Densus 88, while Malaysia tends to favor a repressive approach with a strong legal basis through the Social and Political Security Agency (SOSMA), although it has also begun developing rehabilitation programs. These differences demonstrate that counter-terrorism policies cannot be separated from the context of state ideology, legal systems, and sensitivity to human rights issues. Therefore, it is crucial for both countries to develop a balanced approach between security enforcement and human rights protection, so that the effectiveness of counter-terrorism efforts does not create new social exclusions that could foster radicalism. Therefore, further research needs to be directed at evaluating the long-term impact of the deradicalization approach , particularly in relation to the reintegration process of former terrorists and strengthening social cohesion in society.

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