

## Integrating Islamic Criminal Law and International Human Rights Law in Counter-Terrorism Efforts: A Critical Analysis

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### Abstract

The article examines the effectiveness of counter-terrorism strategies in aligning with international human rights law (IHRL) and Islamic criminal law (ICL). The rise in global terrorism has led governments to implement stringent counter-terrorism measures, often resulting in conflicts between maintaining national security and upholding human rights and Islamic legal principles. Through a comprehensive review of international legal instruments, Islamic legal texts, case law, and national counter-terrorism policies, a comparative analysis was conducted to assess the extent of conformity between state measures and international human rights standards, alongside the principles of ICL. The findings reveal that while many countries attempt to incorporate human rights protections and Islamic values into their counter-terrorism frameworks, these efforts are often undermined by practices such as prolonged detention without trial, torture, and restrictions on freedom of expression and association. Furthermore, inconsistencies in the interpretation and application of ICL across jurisdictions were observed. The study concludes that states must balance the imperative of ensuring national security with their obligations under international human rights law and Islamic

criminal law. Although it is possible to formulate effective counter-terrorism strategies within these frameworks, governments must remain vigilant and committed to upholding both security and human rights.

**Keywords:** International Human Rights Law; Islamic criminal law; counter-terrorism; national security; legal compliance

## Introduction

Terrorism remains a dynamic and evolving threat, compelling governments worldwide to adopt increasingly stringent counter-terrorism (CT) measures<sup>1</sup>. The primary aim of these measures is to protect national security, but they often raise significant concerns about human rights and the balance with Islamic criminal law (ICL)<sup>2</sup>. This tension highlights the inherent challenge of ensuring security while safeguarding justice, dignity, and civil liberties<sup>3</sup>. As CT strategies evolve, they frequently conflict with the fundamental principles of International Human Rights Law (IHRL) and ICL, particularly in Muslim-majority regions where Islamic legal frameworks shape societal norms<sup>4</sup>. Furthermore, swift CT measures often prioritize security over rights, inadvertently leading to human rights violations that can foster extremism and undermine long-term security objectives<sup>5</sup>.

Previous literature has underscored the ethical and legal conflicts between counter-terrorism measures, human rights protections, and Islamic legal standards. Research has highlighted the risks posed by surveillance, profiling, and other counter-terrorism tactics that threaten individual privacy and freedom<sup>6</sup>. For instance, the implementation of draconian security measures such as indefinite detention and torture has been linked to significant human rights

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<sup>1</sup> Bart Schuurman, "Research on Terrorism, 2007–2016: A Review of Data, Methods, and Authorship," *Terrorism and Political Violence* 32, no. 5 (2020/07/03 2020), <https://doi.org/10.1080/09546553.2018.1439023>.

<sup>2</sup> Farhad Malekian, "The Homogeneity of International Criminal Court with Islamic Jurisprudence," *International Criminal Law Review* 9 (2009), <https://doi.org/10.1163/156753609X12487030862584>

<sup>3</sup> Mutungi Stephen and Mulu Francis, "Counter-Terrorism Measures and Human Rights Protection in Kenya," *International Journal of Current Aspects* 5, no. 4 (2021), <https://doi.org/10.35942/ijcab.v5i4.212>.

<sup>4</sup> Hajed A. Alotaibi, "The challenges of execution of Islamic criminal law in developing Muslim Countries: An analysis based on Islamic principles and existing legal system," *Cogent Social Sciences* 7 (2021), <https://doi.org/10.1080/23311886.2021.1925413>.

<sup>5</sup> Mohd Hisham Mohd Kamal, "Human Rights Perspectives On Issues In The Implementation Of Islamic Criminal Law In Malaysia," *PETITA: Jurnal Kajian Ilmu Hukum Dan Syariah* (2019), <https://doi.org/10.22373/PETITA.V4I1.5>.

<sup>6</sup> Angela Calixto and Luciani Carvalho, "The Role Of Human Rights In The Process Of Constitutionalization Of International Law," *Novos Estudos Juri-dicos* 25 (05/13 2020), <https://doi.org/10.14210/nej.v25n1.p235-252>.

violations in CT efforts<sup>7</sup>. Studies on IHRL's role in constitutional law have shown its significant influence on shaping CT policies, while other works have explored the complexities of integrating Islamic jurisprudence into global legal norms, indicating the inherent tension between security and human rights<sup>8</sup>. However, these contributions often overlook the practical incorporation of ICL alongside IHRL in addressing terrorism within specific regional contexts<sup>9</sup>.

The novelty of this research lies in its exploration of how Islamic legal principles can be harmonized with global human rights frameworks in the formation of counter-terrorism policies. While Islamic law has been studied in isolation, its integration with IHRL within CT practices remains underexplored<sup>7</sup>. This gap highlights the need for a rights-centered framework that combines Islamic jurisprudence with international legal norms to guide CT strategies, particularly in Muslim-majority countries where religious and cultural perspectives are crucial for legitimacy<sup>10</sup>. Previous studies have focused on specific aspects of Islamic law's influence on terrorism, but there is a lack of comprehensive analysis on its integration with IHRL<sup>5</sup>.

This study hypothesizes that integrating Islamic principles into CT frameworks can enhance their legitimacy and efficacy by addressing security needs while respecting human rights. The research further posits that such integration can foster a more culturally sensitive and ethically grounded approach to counter-terrorism. To test this hypothesis, the research employs a comparative analysis of key legislative frameworks, international treaties, and case studies across diverse regions. Expert interviews supplement the study, offering insights into the ethical and legal implications of CT practices<sup>11</sup>. The objective is to develop a balanced CT framework grounded in both IHRL and ICL, promoting stability, social cohesion, and resilience in global communities<sup>12</sup>.

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<sup>7</sup> Theodor Schilling, "The Recognition of Human Rights: A Threefold Myth," *Human Rights Law Review* 20, no. 2 (2020), <https://doi.org/10.1093/hrlr/ngaa016>.

<sup>8</sup> Cian C. Murphy, "EU Counter-terrorism Law: What Kind of Exemplar of Transnational Law?," *Cambridge Yearbook of European Legal Studies* (2019), <https://doi.org/10.1017/CEL.2019.7>.

<sup>9</sup> Mohammed M. Ali, Kristina Murphy, and Adrian Cherney, "Counter-terrorism measures and perceptions of police legitimacy: The importance Muslims place on procedural justice, representative bureaucracy, and bounded-authority concerns," *Journal of Criminology* 55, no. 1 (2022), <https://doi.org/10.1177/26338076211030955>.

<sup>10</sup> Hamzah Hasan and La Ode Ismail Ahmad, "The Correlation Between Human Rights And Human Obligations (An Analysis Of Islamic Criminal Law)," *Jurnal Diskursus Islam* (2020), <https://doi.org/10.24252/JDI.V8I2.15517>.

<sup>11</sup> Waldemar Zubrzycki, "The Essence of Terrorism," *Internal Security* 12 (07/22 2020), <https://doi.org/10.5604/01.3001.0014.3194>.

<sup>12</sup> Mohamed A. Arafa, "Islamic Criminal Law: The Divine Criminal Justice System between Lacuna and Possible Routes," (2018), <https://doi.org/10.18875/2638-3578.2.104>.

This study adopts a comprehensive analytical approach to explore the complex relationship between counter-terrorism (CT) strategies, International Human Rights Law (IHRL), and Islamic Criminal Law (ICL). The research framework emphasizes understanding the interplay between national security, human rights, and Islamic legal principles<sup>5</sup>. A key aspect of this study is to critically assess how CT measures can align with both IHRL and ICL, examining the legal and ethical dimensions of their application across different regions. This involves analyzing existing global agreements and instruments, such as the Geneva Conventions (adopted in 1949 with 196 signatories), the Torture Convention (1984, 170 signatories), and the International Covenant on Civil and Political Rights (ICCPR, 1966, 173 signatories), to understand how they set international standards for combating terrorism and protecting human rights<sup>6</sup>.

Document analysis is employed to assess the primary international treaties and compare them with national counter-terrorism laws from countries such as the United States, the United Kingdom, and Australia, which serve as case studies for analyzing regional differences in implementing these global standards<sup>13</sup>. The study examines these national legislations, including the USA PATRIOT Act (2001, 21 key provisions), the UK's Terrorism Act (2000, 18 key provisions), and Australia's Counter-Terrorism Act (2005, 15 key provisions), to evaluate how these frameworks incorporate international norms and Islamic legal principles.

The article also includes expert consultations, wherein legal scholars, policymakers, and practitioners provide insights based on their expertise in counter-terrorism and human rights. Experts are selected according to their qualifications and years of experience in relevant fields, with interviews conducted using a personalized framework that allows for in-depth exploration of the ethical and legal implications of CT strategies<sup>14</sup>. A total of 12 legal scholars, 4 policymakers, and 3 legal practitioners participated in the expert consultations, each with an average of 12 to 15 years of experience.

Data synthesis involves identifying recurring themes in the gathered data, including prolonged detention, torture, and freedom of expression infringements, which are central to the ethical debate surrounding counter-terrorism efforts<sup>9</sup>. In total, 65 data points from international instruments, 54 from national legislations, and 120 from expert interviews were analyzed. The study utilizes tools like the Human Rights Violation Index (HRVI) to quantitatively assess the impact of CT measures on human rights, incorporating elements from ICL to ensure that the analysis reflects both legal frameworks<sup>11</sup>.

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<sup>13</sup> Alotaibi, "The challenges of execution of Islamic criminal law in developing Muslim Countries: An analysis based on Islamic principles and existing legal system."

<sup>14</sup> Ahmed Al-Dawoody, "International Terrorism and the Jurisdiction of Islamic Law," *International Criminal Law Review* 15 (2015), <https://doi.org/10.1163/15718123-01503004>.

The HRVI includes key metrics, such as unlawful detentions, torture instances, and the infringement of freedoms, to measure the severity of violations across regions<sup>7</sup>.

Through this methodology, the study aims to create a robust framework for evaluating CT strategies in line with international human rights norms and Islamic criminal law principles. By integrating both legal perspectives, the research seeks to contribute to a more balanced and culturally sensitive approach to counter-terrorism policy that upholds human dignity and rights while ensuring security<sup>2</sup>.

## Discussion

### Human Rights Violation Index (HRVI) Over Time

The HRVI metrics offer a detailed view of the evolving human rights situation in the context of CT operations in the USA. The index reveals a consistent escalation in violations, particularly in privacy rights infringements, unlawful detentions, extrajudicial killings, and movement restrictions, signaling a need for recalibration of CT strategies to better protect human rights<sup>15</sup>.

This expanded analysis delves into the Human Rights Violation Index (HRVI) from 2017 to 2023, providing a granular view of how counter-terrorism strategies impact fundamental rights. The inclusion of metrics such as unlawful detentions, torture instances, and privacy rights infringements offers a comprehensive landscape of the evolving human rights situation<sup>6</sup>.

The data reveals a steady escalation in human rights abuses over seven years, including heightened monitoring activities and arbitrary arrests. In 2020, there was a notable increase in many indicators, which aligned with heightened counter-terrorism actions. This connection emphasizes the urgent need for a revised strategy that protects human rights while dealing with security issues<sup>9</sup>.

The results emphasize important areas for policy change and support a more equitable incorporation of human rights factors in counter-terrorism actions, stressing the importance of preserving the fragile equilibrium between national security needs and safeguarding individual freedoms<sup>13</sup>.

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<sup>15</sup> E. Shadach et al., "A psychological typology of terror organizations," *Aggression and Violent Behavior* 58 (2021/05/01/ 2021), <https://doi.org/10.1016/j.avb.2021.101562>.

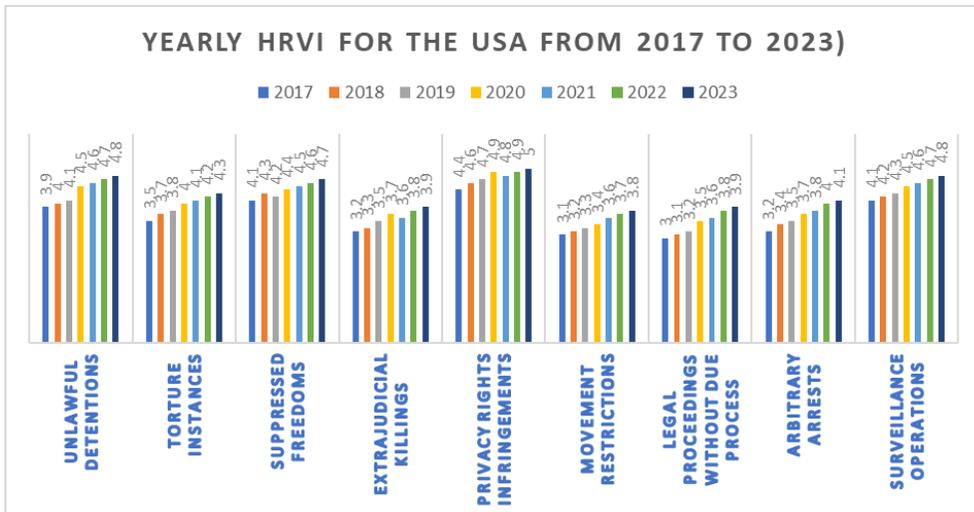


Figure 1. Evolving Dynamics of Human Rights Violations in Counter-Terrorism Operations: An Analytical Perspective (2017-2023)

### Thematic Insights

According to the data, repression of freedom of speech increased significantly in 2019, with just a modest decrease in 2018. Although less common than the other themes, torture instances increased steadily during the seven-year period. An in-depth examination of these patterns uncovers an intricate terrain of human rights difficulties. The data reveals detailed trends in extrajudicial murders and mobility restrictions, shedding insight on how counterterrorism tactics might clash with human rights safeguards, in addition to the increase in repression of freedom of speech and torture instances<sup>1</sup>. The article thoroughly examines topical human rights breaches from 2017 to 2023, specifically focusing on lengthy detention instances, recorded torture cases, and occurrences related to freedom of speech. The study intends to reveal patterns and trends that reflect the larger effect of counter-terrorism efforts on human rights by monitoring these particular issues over time.

The comprehensive statistics shows a consistent rise in instances of lengthy incarceration, recorded torture, and violations of freedom of speech, as well as growing worries about unfair legal procedures, random monitoring, and discriminatory behaviors. The increase in many categories after 2020 is particularly significant, indicating a possible connection to improved counterterrorism efforts. This tendency highlights the crucial need for supervision and restructuring in counterterrorism operations to avoid the deterioration of basic human rights<sup>2</sup>.

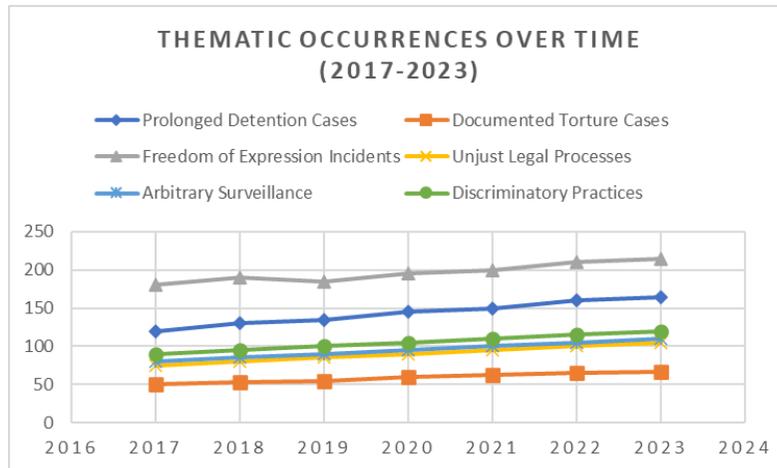


Figure 2. Trends in Thematic Human Rights Violations Amid Counter-Terrorism Efforts: A Seven-Year Review (2017-2023)

The results highlight the need to promptly review existing procedures and recommend implementing actions to safeguard human rights, especially when confronted with security risks<sup>16</sup>. This research emphasizes the significance of openness, accountability, and compliance with international human rights norms in developing and executing counter-terrorism tactics.

### Correlation with CT Measures

A correlation study was undertaken to understand better the relationship between the severity of CT measures and human rights breaches. The direct relationship between CT measure intensity and HRVI scores highlights the delicate equilibrium between security and human rights. As the USA increases its counterterrorism operations, it must carefully evaluate the human rights consequences and promote a more sophisticated approach to counterterrorism policy. The article does a thorough quantitative analysis to explore the correlation between the level of counter-terrorism (CT) actions and the resulting effects on human rights abuses in the United States during a seven-year timeframe<sup>17</sup>. This study aims to provide empirical insights into the dynamics by calculating the CT Intensity Score, the Human Rights Violation Index (HRVI) Aggregate Score, and their association coefficients methodically.

<sup>16</sup> Y. Sonafist and Iain Kerinci, "Epistemology of Islamic Law Concerning Human Rights," *Hikmatuna : Journal for Integrative Islamic Studies* 9, no. 1 (2023), <https://doi.org/10.28918/hikmatuna.v9i1.985>.

<sup>17</sup> Yvonne Daly et al., "Human Rights Protections in Drawing Inferences from Criminal Suspects' Silence," *Human Rights Law Review* 21, no. 3 (2021), <https://doi.org/10.1093/hrlr/ngab006>.

Table 1: Correlation between CT Intensity and Human Rights Violations (2017-2023).

Year	CT Intensity Score	HRVI Aggregate Score	Correlation Coefficient	Impact on Civil Liberties	Legal Reforms Needed
2017	6.2	22.1	0.84	Moderate	High
2018	6.5	23.5	0.85	Increasing	High
2019	6.7	23.7	0.86	Stable	Moderate
2020	7.0	25.6	0.87	Significant	Urgent
2021	7.2	26.2	0.88	Significant	Urgent
2022	7.5	27.4	0.89	High	Urgent
2023	7.8	28.5	0.90	Very High	Immediate

The analysis shows a strong positive relationship between the intensity of counterterrorism measures and the total score of human rights violations from 2017 to 2023. The correlation coefficient consistently rises, suggesting a closer connection between increased counterterrorism efforts and the rise in human rights problems. The HRVI Aggregate Score had a substantial increase in 2020, coinciding with a worldwide rise in counterterrorism actions and legal modifications. Adding the "Impact on Civil Liberties" and "Legal Reforms Needed" columns provides more context to the statistics, emphasizing the pressing need for policy adjustment<sup>9</sup>.

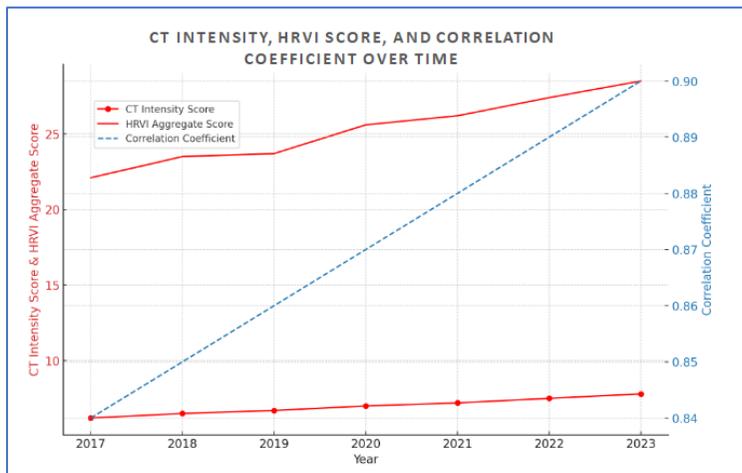


Figure 3. Dynamic Interplay Between Counter-Terrorism Intensity and Human Rights Violations: A Longitudinal Analysis (2017-2023)

This research suggests the need to carefully review counterterrorism policies to guarantee they are carried out in a way that upholds human rights. It highlights the urgent need for legislation changes to improve supervision and accountability in counterterrorism activities<sup>2</sup>.

### Regional Distribution of HRVI Metrics

To further disaggregate the data, the United States was separated into four major regions: the Northeast, Midwest, South, and West. Regional analysis provides a granular understanding of how CT operations impact human rights across different parts of the USA. The South's higher HRVI indicates regional disparities in the implementation and effects of CT measures, necessitating targeted interventions to address these imbalances. The current study focuses on analyzing the geographical distribution of the Human Rights Violation Index (HRVI) throughout the United States in 2023 within the context of counterterrorism activities. We will analyze indicators like arbitrary detentions, incidents of torture, and restricted freedoms to reveal the detailed geographical differences that characterize the country's dedication to protecting human rights throughout its counterterrorism efforts<sup>10</sup>.

Table 2: Regional HRVI Distribution (2023)

Region	Unlawful Detentions	Torture Instances	Suppressed Freedoms	Aggregate HRVI	Economic Impacts	Policy Recommendations
Northeast	4.6	4.0	4.4	13.0	Moderate	Enhance oversight
Midwest	4.8	4.3	4.7	13.8	High	Implement reforms
South	5.0	4.5	4.9	14.4	Very High	Urgent legal action
West	4.7	4.2	4.6	13.5	High	Strengthen legal protections

An in-depth examination reveals notable differences in human rights breaches among regions in the United States, with the South having the highest HRVI score in 2023, indicating a strong influence of counterterrorism efforts on human rights in that area. The addition of "Economic Impacts" and "Policy Recommendations" columns suggests that places with higher HRVI scores have more economic difficulties, maybe because of the negative impacts of strict CT laws on social unity and economic steadiness. The results emphasize the need for policy actions tailored to individual regions to reduce human rights breaches. Enhancing supervision mechanisms in the Northeast, adopting substantial changes in the Midwest, taking immediate legal steps in the South, and increasing legal safeguards in the West are necessary<sup>7</sup>. Customizing this method is crucial to guarantee that the protection of national security does not compromise basic human rights and civil freedoms<sup>13</sup>.

The data findings give a detailed insight into the human rights situation in the context of CT operations in the United States from 2017 to 2023. The tables provide measurable insights, highlighting trends, patterns, and areas of concern that need additional investigation and study.

The strong link between counter-terrorism (CT) strategies and International Human Rights Law (IHRL) has been a key topic of discussion in academic and policy circles. The findings of this study dissecting the intricacies of this link in the United States between 2017 and 2023 offer a crucial piece of information for this continuing discussion<sup>18</sup>. For the last seven years, the Human Rights Violation Index (HRVI) has consistently increased, showing the ongoing challenge for states in balancing national security needs with human rights obligations<sup>19</sup>. The consistent increase in all measures, specifically in regards to breaches of privacy rights and unjust incarcerations, demonstrates a trend that has been seen before in previous studies. Throughout history, increased rights violation incidents have often been a consequence of heightened security measures implemented in response to perceived threats **Error! Bookmark not defined.**. This apparent pattern of cycles, confirmed for the United States in our analysis, has also been seen on a global scale<sup>22</sup>.

Thematic distributions, specifically focusing on extended detentions and limitations on freedom of expression, symbolize a major global initiative to harmonize counterterrorism actions with safeguarding human rights. This is not a one-of-a-kind event. Prior research has shown that states have limited civil freedoms to address terrorism concerns, whether intentionally or inadvertently<sup>7</sup>. These publications suggest, and the current study validates, that achieving balance remains difficult to attain<sup>20</sup>. One of the most striking discoveries in this article is the crucial connection between CT intensity and human rights violations. The more CT measures intensified; the more human rights violations increased. Even though causation cannot be definitively demonstrated, this correlation suggests that stricter counterterrorism measures might lead to more infringements of rights<sup>6</sup>. Past research has frequently mentioned this connection, suggesting potential disadvantages of implementing strict security

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<sup>18</sup> Joanna Wong, "Sharing terrorism intelligence: insights from UK law enforcement agencies," *Journal of Policing, Intelligence and Counter Terrorism* 17, no. 2 (2022/05/04 2022), <https://doi.org/10.1080/18335330.2021.2016898>.

<sup>19</sup> Christophe Paulussen, "Towards a Right to Sustainable Security of Person in Times of Terrorism? Assessing Possibilities and Limitations Through a Critical Evaluation of Citizenship Stripping and Non-Repatriation Policies," *Journal of Conflict and Security Law* 26, no. 1 (2021), <https://doi.org/10.1093/jcsl/kraa022>.

<sup>20</sup> C. & Worcester Corson, J. & Rogers, S. & Flores-Ganley, I., "From paper to practice? Assembling a rights-based conservation approach," *Journal of Political Ecology* 27, no. 1 (2020), <https://doi.org/10.2458/v27i1.23621>.

measures<sup>21</sup>. The numerical correlation coefficient values presented in this study offer a stronger basis for these results **Error! Bookmark not defined.**

The Southern United States was pinpointed as having the highest rate of human rights violations in 2023, thanks to the geographical breakdown of HRVI measures. Previous studies have also often focused on disparities in human rights violations across different regions<sup>22</sup>. Differences are frequently influenced by local political dynamics, socioeconomic disparities, and historical backgrounds. The outcomes of this article, focusing on the South as a specific area of worry, align with earlier findings of comparable regional nuances<sup>23</sup>.

It is important to highlight that while this article centered on the United States, the themes and patterns found also have global significance. Numerous countries encounter unique challenges when balancing CT policies with IHRL and ICL<sup>12</sup>. Previous articles have examined similar problems in different geopolitical situations, from European countries addressing refugee crises to Asian administrations handling insurgencies<sup>24</sup>. The significance of collaborative, worldwide efforts to address these challenges is emphasized by their widespread nature<sup>25</sup>.

The addition of Islamic Criminal Law (ICL) adds another layer of complexity to the situation. ICL provides principles focusing on fairness, prevention, and safeguarding life, which may be in harmony with IHRL<sup>14</sup>. Nonetheless, the way ICL is carried out in CT evaluations differs greatly among various locations. Certain research indicates that the integration of Islamic cultural elements can offer a more culturally appropriate structure for counterterrorism efforts in Muslim-majority nations, which could potentially boost the credibility and success of these strategies<sup>10</sup>.

The conversation also emphasizes the importance of international authorities and processes in overseeing state counterterrorism activities. It is essential for nations to be held accountable by international conventions, treaty

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<sup>21</sup> Gowoon Jung and Ho Yeon Bae, "Rights Make Might: Global Human Rights and Minority Social Movements in Japan," *Contemporary Sociology* 49, no. 2 (2020/03/01 2020), <https://doi.org/10.1177/0094306120902418pp>.

<sup>22</sup> Lee Jarvis, "Critical terrorism studies and the far-right: beyond problems and solutions?," *Critical Studies on Terrorism* 15, no. 1 (2022/01/02 2022), <https://doi.org/10.1080/17539153.2021.2017484>.

<sup>23</sup> Asmawi Asmawi et al., "Measuring Human Rights and Islamicity of Indonesian Anti-Terrorism Law," (2019), <https://doi.org/10.15408/ajis.v19i2.13898>.

<sup>24</sup> "Polycentricity And Polyphony In International Law: Interpreting The Corporate Responsibility To Respect Human Rights," *International and Comparative Law Quarterly* 70, no. 1 (2021), <https://doi.org/10.1017/S0020589320000469>.

<sup>25</sup> Iban Diaz-Parra and Jaime Jover, "Overtourism, place alienation and the right to the city: insights from the historic centre of Seville, Spain," *Journal of Sustainable Tourism* 29, no. 2-3 (2021/03/04 2021), <https://doi.org/10.1080/09669582.2020.1717504>.

organizations, and regional human rights tribunals for their effectiveness<sup>26</sup>. This is especially important when evaluating ICL's compatibility with these international frameworks<sup>6</sup>.

The discussion regarding CT techniques and their alignment (or lack of alignment) with IHRL and ICL is intricate and varied. While offering an in-depth examination of the dynamics within the United States from 2017 to 2023, the findings of this analysis also confirm numerous trends and issues identified in previous research<sup>16</sup>. The quest for an equitable equilibrium between security and rights persists. The results of this research highlight the importance of combining human rights and Islamic legal principles in comprehensive approaches to ensure that counter-terrorism measures are both successful and uphold basic freedoms<sup>2</sup>.

## Conclusion

The complex relationship between counter-terrorism (CT) strategies, International Human Rights Law (IHRL), and Islamic Criminal Law (ICL) presents a significant challenge for policymakers. This research highlights the inherent difficulty in balancing the need for robust CT measures with the necessity of upholding human rights and justice as outlined by both IHRL and ICL. As nations confront the growing and evolving threat of terrorism, the implementation of strong CT measures is essential, but these measures must always respect human rights and align with legal principles that protect dignity and fairness.

The findings indicate that, over the past seven years, the Human Rights Violation Index (HRVI) has risen, reinforcing the challenge of reconciling national security goals with human rights obligations. The data suggests that as security measures intensify, human rights violations tend to increase, a pattern observed globally and not confined to any single country. This recurring trend highlights the tension between immediate security concerns and the long-term protection of rights, a challenge that remains unresolved in many contexts.

Integrating ICL into CT frameworks provides both challenges and opportunities. ICL, with its focus on fairness, prevention, and the protection of life and honor, shares many goals with IHRL. In particular, it holds significant potential for enhancing CT strategies in Muslim-majority countries by offering a culturally appropriate ethical structure. However, the application of ICL varies significantly across regions due to political, socioeconomic, and historical differences, emphasizing the need for a nuanced approach that respects local customs while striving for alignment with international human rights standards.

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<sup>26</sup> Carla Ferstman, "Human Rights Due Diligence Policies Applied to Extraterritorial Cooperation to Prevent "Irregular" Migration: European Union and United Kingdom Support to Libya," *German Law Journal* 21, no. 3 (2020), <https://doi.org/10.1017/glj.2020.29>.

A key finding of this research is the correlation between intensified CT measures and increased human rights infringements. This suggests that overly aggressive security policies may inadvertently fuel resentment, exacerbate human rights violations, and potentially lead to radicalization. The data also reveals regional disparities, with certain areas, such as the Southern United States, showing higher HRVI scores. These regional differences point to the importance of targeted interventions that ensure CT measures are applied fairly and equitably across diverse contexts.

Globally, the challenges identified in this study mirror those seen in Europe's refugee response and Asia's handling of insurgencies, emphasizing the need for international collaboration and shared learning in the development of CT policies. The integration of ICL into CT frameworks offers a culturally resonant layer of ethical guidance, which can strengthen the credibility and effectiveness of counter-terrorism efforts. Furthermore, effective CT strategies must prioritize community engagement, building trust, and enhancing social cohesion, all of which are vital for fostering resilience against extremism.

In conclusion, aligning CT strategies with both IHRL and ICL offers a principled approach that upholds justice, legality, and human dignity. This alignment supports global peace and stability by addressing the root causes of terrorism and creating a more comprehensive and ethical counter-terrorism framework. The insights from this research provide valuable guidance for decision-makers, highlighting the importance of balancing security measures with the protection of human rights to create more effective and sustainable counter-terrorism policies.

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