

France's ISIS returnee women: A pivotal moment
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I. Introduction

This week, France is setting the precedent for how they will prosecute hundreds of female Daesh members. This will have significant implications for France's approach to counterterrorism, and the future of Daesh's remaining foothold in Syria and Iraq.

While women have always been present in political violence, their roles and participation have consistently been obscured by a focus on their male counterparts. However, when an estimated 2500 European women¹, and roughly 400 Frenchwomen (the single largest female contingent of any European country), left to join the Islamic State, hereafter Daesh, their presence became incontrovertible. This in turn raised a series of new questions for legal and security actors: how to understand, assess, and prosecute these women for their time with Daesh? This last question is being answered in real time in France.

France's judicial and counterterrorism approaches are inextricably linked. Indeed, France's internal security service (DGSI) has a special counterterrorism justice unit which does much of the primary investigation for terrorism dossiers, working closely with the Ministry of Justice's counterterrorism unit (Parquet nationale antiterroriste, or PNAT) which in turn serves as prosecutor in all terrorism cases before the Cour d'assises spécialement composée, or the Special Assizes Court. Accordingly, changes in judicial policy reflect changes in security policy, and vice versa. This interaction has been particularly apparent in the case of female Daesh returnees. Going from minimal engagement with these women, and effectively leaving activities supporting Daesh's ideology (possibly including indoctrinating their children) unchecked in camps in Northeast Syria, to full investigation of both these women as well as their networks, French legal and counterterrorism policy have dramatically changed. This signals that all members of the group will be treated diligently and it implies concern about the potential security threats posed by female returnees. It also suggests a major crackdown on actual or potential female Daesh supporters in Syria, amid reports of a resurgence², including in Al-Hol camp itself³. As France has never prosecuted female members of a terrorist group in numbers of this magnitude, these events are causing a reckoning with French governmental, public, and judiciary views on the nature of women's engagement and ideological conviction with political violence. Given the great significance of these events for France's counterterrorism as well as its legal policy, this article seeks to establish a state of play regarding the French response to these women to date, in order to support an informed understanding of the challenges ahead.

¹ Cook, J., & Vale, G. (2018). From Daesh to 'Diaspora' II: The Challenges Posed by Women and Minors After the Fall of the Caliphate. *ICSR*, 12(6), 30–45.

² Hamasaeed, S. (2022). ISIS is a Problem of Yesterday, Today and Tomorrow. <https://www.usip.org/publications/2022/07/isis-problem-yesterday-today-and-tomorrow>; Souleiman, D. (2023, February 1). Syrians fear Islamic State resurgence as Kurdish-led forces sweep Raqqa. *Al-Monitor*. <https://www.al-monitor.com/originals/2023/02/syrians-fear-islamic-state-resurgence-kurdish-led-forces-sweep-raqqa>

³ SDF Center. (2022). The First Week Outcome, Operation Humanity & Security 2, al-Hol camp. <https://sdf-press.com/en/2022/09/the-first-week-outcome-operation-humanity-security-2-al-hol-camp/>

II. Legal and counter-terrorism approaches to “les revenantes”: 2013-2023

After a years-long reluctance to repatriate the Frenchwomen that stayed in Syria until the end of the so-called caliphate, known as “les revenantes”, and who then went to the camps in Northeast Syria with their children, France decided to start repatriating these women in 2022. Until then, French citizens constituted the largest group of Europeans left behind⁴; currently, roughly 50 French women and 100 French children remain in the camps⁵, the rest having fled or been repatriated. Any prosecution to date has been for those women that fled before the start of the fall of Daesh in late 2017 (though Daesh’s last held territory would not be retrieved until 2019). This March, jurisprudence and legal precedent will be established in the Special Assizes Court for the first cases of the women that stayed on to the end, representing a new phase in the French government’s responses to “les revenantes”.

The evolution of French security and legal responses to female returnees from Daesh to date can be broadly organized into three phases from 2013 through the present day. These phases are defined by the chronology of the French government’s changing political and legal approach and jurisprudence. However, due to a delay between return and prosecution, each phase may address women that have returned years earlier, thereby also reflecting differing profiles of the women themselves, including when they joined Daesh, how long they stayed in Syria and/or Iraq, when they left, and whether they stayed in the camps in Northeast Syria. These, in turn, have implications for women’s prosecution.

Phase 1 (2013-2015)

Phase 1 is characterized by a relative “invisibility”⁶ of women from legal proceedings of Daesh returnees. Later referring to this period as one of “extreme naïveté”⁷, the former chief prosecutor François Molins admitted that during this period, the government was still seized by the idea that female Daesh members “departed to do domestic tasks for their husbands and care for children”⁸, and therefore pose no security threat. This view was underpinned by a paternalistic assumption of these women’s innate victimhood, and that they had necessarily been coerced to join Daesh by the men in their lives. This said, it is credible that at least some of the women that returned prior to 2017 had indeed been coerced, as they took the risk of smuggling themselves out through Turkey; this assessment is supported by the recent sentencing of a woman in January 2023 to 5 years, of which 3 will be on probation, for her time with Daesh⁹. Moreover, in 2015, the Cazeneuve protocol was established in conjunction with Turkish authorities, which allowed for systematic arrests of all French

⁴ Discussion of Constance Wilhelm with expert on the camps in Northeast Syria, November 2021.

⁵ These figures are provided by a CAT estimate from January 2023 and from Joly, G. (2023, January 24). Rapatriement depuis la Syrie : “Il reste une centaine d’enfants et une cinquantaine de femmes”, souligne l’avocate Marie Dosé. Radio France. https://www.francetvinfo.fr/monde/syrie/rapatriement-depuis-la-syrie-il-reste-une-centaine-d-enfants-et-une-cinquantaine-de-femmes-souligne-l-avocate-marie-dose_5619329.html

⁶ Interview with a legal expert by Constance Wilhelm, 19 January 2023

⁷ Besnier, C., Weill, S., Mégie, A., & Salas, D. (2019). *Les Filières Djihadistes en Procès: Approche Ethnographique des Audiences Criminelles et Correctionnelles (2017-2019)*. <http://www.gip-recherche-justice.fr/wp-content/uploads/2020/01/17.29-Rapport-final.pdf>, p. 196 - Quote translated by Constance Wilhelm

⁸ Besnier, C., Weill, S., Mégie, A & Salas, D., *ibid*.

⁹ Trial observation at the Paris Special Assizes Court by Constance Wilhelm of a Daesh couple, January 2023.

returnees from Syria¹⁰. Despite the great increase in information available to French authorities regarding female returnees by the end of this phase, it wouldn't be until the failed attacks using gas cylinders against Notre Dame de Paris in September 2016 by an all-female Daesh cell¹¹, that French policy towards these women would dramatically shift.

Phase 2 (2016-2022)

Phase 2 represents a significant evolution in legal policy concerning the “revenants”. The failed gas cylinder attack was the first time there was unambiguous proof that women too were capable and motivated to carry out terrorist attacks. Indeed, the attack almost succeeded (all was in place, but the cylinders' ignition failed); this was one of 33 attacks launched by women in Europe between 2014 and 2018¹². This sparked debate in France as to why women were not being prosecuted as well as men, and marked a sea change in thinking: the government started taking an active interest in studying and understanding the roles and motivations of female Daesh members.

Starting in summer 2016 - and to address the multiplication of returns and attempted departures for Syria - the “Parquet”¹³ adopted a new, standardized¹⁴ penal policy: any departures to Iraq and Syria following the January 2015 attacks in Paris launched a judicial investigation for an AMT infraction - association de malfaiteurs en relation avec une entreprise terroriste, or criminal association in relation to a terrorist undertaking, discussed below¹⁵. Critically, women began to be systematically prosecuted starting the end of 2016. However, unlike their male counterparts, early in this phase women were largely tried through the Correctional Tribunal, for more minor crimes, and not through the Special Assizes Court for major crimes under the AMT law¹⁶. Only later in this phase there started to be a systematic filtering of female cases through the Special Assizes Court which corresponded with a greater understanding of their roles within Daesh, as well as of their level of indoctrination and the security risk they represented.

Despite being tried and sentenced with increasing severity¹⁷, these women's profiles were largely consistent with previous cases. Moreover, women's legal defenses could also be seen to echo one another: emphasizing that their role, exposure, activities, and conviction regarding their time with Daesh were passive, non-violent, and domestic, aligned with the broad strokes of the ideas propagated regarding these women during Phase 1. Recently, one woman said that her recruitment

¹⁰ Koller, Sofia (upcoming February-March 2023). CEP Policy Paper: Prosecution of Returnees from Syria and Iraq in France. Counter Extremism Project.

¹¹ Simcox, R. (2018). The 2016 French Female Attack Cell: A Case Study. CTC Sentinel: Combating Terrorism Center at West Point, 11(6), 21–25. www.ctc.usma.edu/sentinel/

¹² Simcox, R. (2018). The 2016 French Female Attack Cell: A Case Study. CTC Sentinel: Combating Terrorism Center at West Point, 11(6), 21–25. www.ctc.usma.edu/sentinel/

¹³ The Parquet, or Ministère public, is charged with defending public interests and applying the law. When it comes to antiterror law, starting 2019 a special section in charge of the prosecution was created : the Parquet National Antiterroriste (PNAT).

¹⁴ Report of the French Senate “commission d'enquête sénatoriale sur les moyens de lutte contre les réseaux djihadistes”, which judged “preferable not to maintain such signal of impunity towards women and young women alimentent djihadist groups”.

¹⁵ Antoine Mégie et Jeanne Pawella, « Les procès correctionnels des filières djihadistes. Juger dans le contexte de la guerre contre le terrorisme », Les Cahiers de la justice (2017), vol. 2., n°2, p.237. As mentioned, this choice of prosecution an initio does not forbid a correctional choice of procedure during the instruction procedure.

¹⁶ However, these crimes can still be “correctionalized”, meaning that those women can still be tried - if the prosecution decides so - by the correctional court of Paris (“16e chambre correctionnelle”).

¹⁷ Interview with a legal expert by Constance Wilhelm, 19 January 2023

to Daesh had not included any exposure to the group's violence¹⁸, while another woman indeed argued that she had no exposure or involvement in Daesh's activities, to the point of not even having heard bombardments, gunfire, or witnessed any of the regular public punishments made (and, according to another female returnee, projected on a loop across the city¹⁹) during her years in Raqqa²⁰. These narratives collide with indications starting in 2015 that Daesh's position was changing regarding women's roles in defensive combat operations²¹, followed by a complete policy shift in 2017 when Daesh announced 'jihad against the enemies' as obligatory for women²². While it is unclear how much of this translated into actual violence committed by women, this marks another notable change in the profile of women returning after 2017.

Phase 3 (2023-?)

The first trials of women that stayed on until the fall of the so-called caliphate, and then went to the camps in Northeast Syria²³, will be tried in March. Hundreds of cases can be expected to be prosecuted in the coming years for female returnees, based on the jurisprudence established for these cases. Whether they fled, were smuggled out of camps, or were repatriated, these women have a different profile from those tried up to now, and these will be amongst the first cases tried following the French government's decision to return remaining French women and children from the camps. The duration of their engagement will raise questions of ideological conviction underlying their recruitment, membership, and activities with the group. These questions will directly relate to the security threat that these women may be assessed to pose, amidst public fears that their return will put French citizens at risk²⁴. Simultaneously, due to the relatively more domestic roles that these women undertook with Daesh, significant challenges remain regarding suitable avenues for prosecution and gathering sufficient evidence of crimes committed. It can be expected that these and many other dimensions will be taken into account while exploring this new judicial dynamic.

¹⁸ BBC News. "Shamima Begum denies watching violent IS propaganda before leaving the UK to join the so-called Islamic State". 7 February 2023. <https://twitter.com/BBCWorld/status/1623090500621197317>

¹⁹ Bouvier, É., & Martelet, C. (2021, November 27). La cage, une Française dans le djihad. ARTE Radio Podcasts. <https://www.youtube.com/watch?v=f8ijvozTpBk>

²⁰ Trial observation at the Paris Special Assizes Court by Constance Wilhelm of a Daesh couple, January 2023.

²¹ Winter, C., & Margolin, D. (2017). The Mujahidat Dilemma: Female Combatants and the Islamic State. CTC Sentinel, 10(7), 23–28. www.ctc.usma.edu/sentinel/

²² Cook, J. (2019). Women and terror after 9/11: The case of Islamic State. In D. M. Jones, P. Schulte, & C. Ungerer (Eds.), Handbook of Terrorism and Counter Terrorism Post 9/11 (pp. 143–159). Edward Elgar Publishing.

²³ Décugis, J.-M., Gautronneau, V., & Pham-Lê, J. (2019, November 11) "Djihadistes rapatriés en France : quatre Françaises et leurs enfants sur le retour", in Le Parisien. <https://www.leparisien.fr/faits-divers/djihadistes-rapatries-en-france-quatre-francaises-et-leurs-enfants-sur-le-retour-11-11-2019-8191110.php>

²⁴ Franceinfo. (2019, February 28). Deux tiers des Français souhaitent que les enfants de jihadistes français restent en Irak et en Syrie. Franceinfo. https://www.francetvinfo.fr/monde/proche-orient/offensive-jihadiste-en-irak/deux-tiers-des-francais-souhaitent-que-les-enfants-de-jihadistes-francais-restent-en-irak-et-en-syrie_3211623.html ; Mathieu, L., Le Devin, W., & Albertini, D. (2019, April 4). Etat islamique : un rapatriement programmé, préparé, mais gelé. Liberation. https://www.liberation.fr/france/2019/04/04/etat-islamique-un-rapatriement-programme-prepare-mais-gele_1719480/

III. AMT applied to “les revenantes”

Rather than attempt to create new and specific crimes to prosecute women, which would definitionally be non-exhaustive and risk weakening prosecution for terrorism²⁵, the French legislative chose to adopt a versatile approach, with the possibility of continually adapting to changes in terrorist groups: namely, the AMT law.²⁶

Introduced under law n°96-647 of 22 July 1996, AMT is defined under article 421-2-1 of the French penal code as “the fact of participating in an established group or agreement with the aim of preparing, demonstrated by one or more material facts, of an act of terrorism”.²⁷ AMT is characterized by both establishing a link with a group or agreement (materiality), and proving the individual’s knowledge²⁸ of the group’s intention to commit a terrorist act (intentionality). The AMT law has allowed the state to establish that the act of leaving to Iraq and Syria, with knowledge of what Daesh was doing there²⁹, is sufficient to qualify as criminal.

As all female returnees definitionally left to Iraq and Syria to join Daesh, the key question for their prosecution is whether the investigating magistrates (« juges d’instruction ») find evidence of intentionality; that is, whether they had the clear intention of joining a terrorist group. The evidence collected during the investigation is generally similar: if still possible, the contents of the women’s phones are exploited, including their social media accounts and their contacts with others involved in terrorist networks; witness statements are taken, alongside the women’s own declarations. These elements allow authorities to establish whether the individuals had knowledge of Daesh’s activities before their departure. Additionally, the centralization of counterterrorism procedures in Paris has also facilitated the collection of information on these women.

Furthermore, commonalities between the French women’s recruitment, radicalization, and departures facilitate investigation; these have been studied at length by other authors. In brief, many were recruited via social media through relationships with or seduction by recruiters, and pass through the Turkish border into madafa, or houses for unmarried (or widowed) women upon their arrival until their marriage to Daesh combatants³⁰. Concerning radicalization, the key element is to evaluate the security risk that these women pose, and assess their radicalization process in order to determine their risk of recidivism. Reasons for their departure are also investigated: many explain

²⁵ Report n°639 of the French Senate’s “commission d’enquête sur l’organisation et les moyens des services de l’Etat pour faire face à l’évolution de la menace terroriste après la chute de l’Etat islamique”, registered by the Senate presidency on July 4th, 2018, <https://www.senat.fr/rap/r17-639/r17-6391.pdf>

²⁶ Report n°639 of the French Senate’s “commission d’enquête sur l’organisation et les moyens des services de l’Etat pour faire face à l’évolution de la menace terroriste après la chute de l’Etat islamique”, *ibid* (note 22)

²⁷ Law n°2012-1432 of 21 December 2012 added a significant dimension to this infraction. It recognizes French extraterritorial jurisdiction, in order to allow for the prosecution of citizens or French residents that participated in AMT abroad, and so to incriminate the return of combatants to French territory (see article 113-13 of the French criminal code).

²⁸ The individual demonstrating precise and concrete knowledge of the group’s activities is not required. It is sufficient to know the broad strokes of the terrorist group’s objectives. See also the June 2017 case of the Cannes-Torcy affair before the Special Assizes Court.

²⁹ It has to be noted that this jurisprudence does not exclusively concern Daesh. It also applies, and not only, to Jabhat al Nosra, Ahrar al Sham, Jays Mohamed or to Omar Omsen’s katiba.

³⁰ On this topic, see « Comment j’ai quitté l’enfer de Daech - le périple d’une jeune Française et son fils de retour de Syrie », in FranceTVinfo, https://www.francetvinfo.fr/monde/proche-orient/offensive-jihadiste-en-irak/recit-francetv-info-comment-jai-quitte-lenfer-de-daech_1521493.html

that they left to provide humanitarian assistance to those suffering under Bashar Al Assad's regime; others claim they were doing hijrah (emigrating to Muslim lands as dictated by Islam). Nevertheless, a study of their background, biography, and of their familial and cultural context serves as the primary conduit to understand their reasons for leaving. The date of their departure is also necessarily considered, given its direct relation to the likelihood that they had knowledge of what was taking place in Daesh-held territories in Iraq and Syria. Magistrates must determine whether to take these elements into consideration in their assessments of the women's intentionality.

Moreover, it seems that certain behaviors, including appearing repentant in court, and no longer wearing a headscarf, applying make-up, etc., have been assessed by the Parquet as an indication that they are no longer radicalized³¹. That these behaviors should have a bearing on the outcome of the cases has been the subject of judicial debates, notably given the possibility of these women seeking to hide their engagement, including under the guise of taqiyya (the idea that one should mask their religious engagement to avoid persecution).

Additional elements come into play when assessing the new wave of women that are to be judged, including why they did not return earlier; whether they engaged in terrorist acts while in detention in the camps in Northeast Syria; and whether time spent in these camps will play into their sentencing.

An additional complicating factor is the central role that motherhood plays in repatriation, prosecution, and sentencing. Indeed, the need to bring children home from the camps has been a central impetus to repatriate their mothers³². Concerning prosecution, a 2020 study found that women had been tried in multiple UN member states regarding neglect to duty of care and education of their children, while no fathers had been tried in relation to their parental roles, reflecting a clear gender bias in responsibility for the child³³. Caretaking roles should be taken into account in sentencing, given the deleterious effects on the child's well-being that removal from parents can have (except in cases of indoctrination of children). At the same time, this also implies that women should be less accountable for their crimes, and so unequal to men before the law, due to their role as a mother - that a woman's identity as mother supersedes her identity as an independent, and accountable, member of society.

³¹ Final report of research « Les filières djihadistes en procès », Mission droit et justice, december 2019, p.129, <http://www.gip-recherche-justice.fr/wp-content/uploads/2020/01/17.29-Rapport-final.pdf>

³² Joly, G., January 24, 2023, "Rapatriement depuis la Syrie : "Il reste une centaine d'enfants et une cinquantaine de femmes", souligne l'avocate Marie Dosé" for Radio France.

³³ UN Counter-Terrorism Committee. (2020). CTED Analytical Brief: The prosecution of ISIL-associated women. https://www.un.org/sc/ctc/wp-content/uploads/2020/07/CTED_Analytical_Brief_The_Prosecution_of_ISIL-associated_Women.pdf

IV. Comparative views: Germany and the UK

Concerning the judicial treatment of female returnees by France's European neighbors, a study of German and British practices opens further avenues for reflection.

Unlike France, the German Supreme Court has ruled that simply being present in Syria or Iraq during Daesh's rule is not sufficient evidence of membership to Daesh³⁴. In response, German authorities have developed a legislative arsenal to prosecute women, drawing from international humanitarian law, and especially war crimes, as much as from crimes relating to terrorism. These charges are met with stringent material evidentiary requirements and the need for detailed accounts of crimes committed, which can be substantiated with acts such as taking the plane, getting married, or having children, to establish membership to the group.³⁵

The average sentence for German female returnees is 3 years and 10 months, sometimes with probation. The heaviest sentence - 10 years of criminal detention - was given to Jennifer W. on 25 October 2021 for membership to a terrorist group, aiding and abetting an attempt to commit murder by omission, and crimes against humanity. The judges considered that the accused did not react to save an enslaved Yazidi girl from death when her husband left her hanging in the sun with her hands tied above her head as a punishment³⁶.

Moreover, time spent by the accused in the camps in Northeast Syria might be deducted from their criminal sentence. This reflects a particular calculation: one year in Iraqi prison is judged equivalent to three years in German prison³⁷. Indeed, most German women that are condemned for membership to a terrorist group do not return to prison, as their sentence covers both the time spent in pre-trial detention as well as the time spent in the camps³⁸.

The UK has taken yet another approach to the return of its roughly 150 women³⁹ and 750 men⁴⁰ that joined Daesh. Namely, it has heavily relied on administrative legal measures, spanning from limitations on freedom of movement including seizure of travel documents, house arrest, curfews, temporary exclusion orders, and deportation; to surveillance and communication constraints; to citizenship deprivation on the grounds that this is "conductive to the public good"⁴¹. This last point has been the subject of prominent political debate on the role of citizenship deprivation as a response

³⁴ On the whole topic of the judicial treatment of female returnees in Germany, see Koller, S. and Schiele, A., "Holding Women Accountable: Prosecuting Female Returnees in Germany", in CTC Sentinel, december 2021; and Koller, S. (2022). Prosecution of German Women Returning from Syria and Iraq: Insights and Recommendations for Policymakers and Security Agencies. https://www.counterextremism.com/sites/default/files/2022-08/CEP_Policy_Paper_Prosecution_of_German_Women_Returning_from_Syria_and_Iraq_August_2022_final.pdf

³⁵ Koller, S. and Schiele, A, *ibid*.

³⁶ Koller, S. and Schiele, A, *ibid*.

³⁷ This calculation stems from article 46 of the German criminal code, which establishes principles to determine sentencing.

³⁸ Koller, S. and Schiele, A, *ibid*.

³⁹ Cook, J., & Vale, G. (2018). From Daesh to 'Diaspora' II: The Challenges Posed by Women and Minors After the Fall of the Caliphate. ICSR, 12(6), 30–45.

⁴⁰ Foreign terrorist fighters knowledge hub: UK. <https://www.foreignterroristfighters.info/country/gb>

⁴¹ Anderson, D. W. K., Independent Reviewer of Terrorism Legislation., & Stationery Office (Great Britain). (2016). Citizenship removal resulting in statelessness : first report of the independent reviewer on the operation of the power to remove citizenship obtained by naturalisation from person who have no other citizenship. April, 17.

to Daesh returnees, and indeed on how British courts may be serving political aims⁴². Indeed, its use has exponentially increased and facilitated through legislation under Conservative government leadership since 2015. 214 individuals have had their citizenship revoked on “public good” grounds between 2012 and 2021, with a peak in 2017⁴³.

Critics argue that any appeals made to deprivation decisions, which are often issued when an individual is out of the country, or even without any warning, results in not only an inability to conduct an effective appeal, but also a violation of the right to a fair trial as protected under Articles 2 and 6 of the European Convention of Human Rights⁴⁴ and its domestic equivalent, the Human Rights Act 1998.

A further complication is that appeals pass through the Special Immigration Appeals Court (SIAC), which has fully closed proceedings. Evidence provided may be secret even to the accused and their lawyers; these latter may be replaced with special advocates if the secret evidence presented is deemed too sensitive as pertains to national security⁴⁵. This secrecy renders these proceedings fundamentally different to French trials, which are for the most part public. The question of whether female returnees may be disproportionately affected by this practice, perhaps due to limitations of prosecution under terrorism law, difficult evidence collection, or even gendered views of these women’s engagement with Daesh, are ripe for further investigation⁴⁶.

V. Conclusion

After years of ambivalence, the importance of the repatriation and prosecution of Daesh’s female members and their children is increasingly accepted by most countries. Serious issues remain for those still in Syria concerning not only quality of life, health, and education, but also daily exposure to “high levels of violence, exploitation, and abuse”⁴⁷ and the risk that highly radicalized women remaining in the camps may be grooming their children to form the next generation of Daesh. Prosecution is critical to hold all Daesh members, including women, responsible for their crimes, and to ensure that a credible, just, and effective counterterrorism policy is in place to respond to the threats posed by this and other jihadist groups. In this context, the upcoming “revenantes” trials are critically important, and will set the stage for the future of France’s counterterrorism and legal policy.

⁴² Gearty, C. (2023, February 23). Shamima Begum has shown up courts’ deference to this government. It’s a worrying new era. The Guardian. <https://www.theguardian.com/commentisfree/2023/feb/23/shamima-begum-courts-government-human-rights-national-security>

⁴³ Mckinney, C. (2022, January 10). How many people have been stripped of their British citizenship? Free Movement UK. <https://freemovement.org.uk/how-many-people-have-been-stripped-of-their-british-citizenship-home-office-deprivation/>; HMG Counter-Terrorism Disruptive Powers Report 2021. (2023). CP 621 – HM Government Transparency Report: Disruptive Powers 2020. (2022). www.gov.uk/official-documents

⁴⁴ Council of Europe. (1950). European Convention on Human Rights. www.conventions.coe.int.

⁴⁵ Jarvis, L., & Lister, M. (2015). Anti-terrorism, citizenship and security (L. Jarvis & M. Lister (eds.)). Manchester University Press. <https://www.jstor.org/stable/j.ctt1mkb050>; Metcalfe, E. (2009). Secret Evidence. www.justice.org.uk; Zedner, L. (2016). Citizenship Deprivation, Security and Human Rights. *European Journal of Migration and Law*, 18(2), 222–242. <https://doi.org/10.1163/15718166-12342100>

⁴⁶ Indeed, these are currently under study by Constance Wilhelm through her research at King’s College London’s Department of War Studies.

⁴⁷ Bisset, V. (2022, November 16). Two Egyptian girls reported dead at Syria’s al-Hol detention camp. The Washington Post. https://www.washingtonpost.com/world/2022/11/16/syria-al-hol-camp-egyptian-girls/?utm_source=iterable&utm_medium=email&utm_campaign=5562750_