



LEGISLATION AGAINST RADICALISM: INTERNATIONAL EXPERIENCE

Researcher at the National University of Uzbekistan

Khayrullayev Zafar Zabikhilla ugli

Article history:	Abstract:
Received: 14 th March 2026 Accepted: 11 th April 2026	This academic paper examines international legal frameworks designed to counter radicalism. The study analyzes experiences from the European Union, the United States, the United Kingdom, France, Germany, the Netherlands, Southeast Asia, and the Middle East. It evaluates both repressive and preventive approaches, including counter-terrorism financing laws, deradicalization programs, and online content regulation. A comparative assessment with Uzbekistan's national strategy against extremism and terrorism provides grounded recommendations for improving domestic legislation. Special attention is given to balancing security imperatives with fundamental human rights.

Keywords: radicalism, extremism, terrorism, legislation, international experience, combating terrorist financing, prevention of radicalization, deradicalization, digital platforms, human rights, EU directive, FATF, online content governance.

Introduction. One of the most pressing challenges facing the global community today is the increasing threat of radicalism, extremism, and terrorism. Under conditions of globalization, radical ideologies spread without regard for borders. Consequently, joint efforts among nations, harmonization of legal frameworks, and research into advanced international practices have become critically important [1]. The causes behind radicalism are complex and multidimensional, involving socioeconomic, political, ideological, psychological, and cultural factors. As states design counter-radicalism legislation, they inevitably reflect their own national security policies, historical traditions, and legal norms. European countries typically prioritize blocking terrorist financing, applying preventive measures that limit individual freedoms, and implementing deradicalization programs [2]. By contrast, the United States leans heavily on broad security operations and intelligence gathering [3]. Southeast Asian and Middle Eastern states often adopt the most stringent measures, sometimes resorting to harsh enforcement tools [4]. Since gaining independence, the Republic of Uzbekistan has been systematically working to combat extremism and terrorism. The law "On combating extremism" was adopted, the 2021–2026 National Strategy for countering extremism and terrorism was approved, and criminal legislation continues to evolve [5]. Meanwhile, globalization and the rapid spread of internet technologies have opened new opportunities for radical organizations, which actively recruit young people through social networks and other digital channels. Thus, the relevance of this research stems not only from Uzbekistan's domestic needs but also from the global necessity to develop effective, human-rights-compliant legal mechanisms against radicalism.

Main body. Around the world, legislative approaches to countering radicalism fall into two broad categories: repressive and preventive. The former criminalizes all forms of radical activity harshly, while the latter focuses on preventing radicalization among vulnerable populations through social work and education [6]. Many international instruments have shaped national laws. United Nations Security Council Resolution 1373 (2001) required all member states to criminalize terrorist financing, prosecute those involved in terrorist acts, and provide mutual legal assistance [7]. Following this resolution, numerous countries introduced anti-terrorism financing provisions. In the Philippines, Republic Act No. 11479 (2020) and Republic Act No. 10168 (2012) define terrorism-related actions, association with terrorist groups, and financing as serious crimes. The Philippine law explicitly criminalizes "direct or indirect collection, accumulation, storage, or transfer of funds for the purpose of committing terrorist acts or supporting a terrorist organization" [8]. The European Union has adopted directives and regulations to create a common legal basis against radicalism. The 2017 Counter-Terrorism Directive broadened the definition of terrorism and required member states to criminalize public incitement, recruitment, and travel for terrorist purposes [9]. In 2026, Council Regulation (EU) 2026/456 reinforced restrictive measures against specific individuals and entities, aligning with Common Position 2001/931/CFSP. The regulation notes that while jihadist terrorism remains the most widespread threat, extremists' motivations are growing more diverse and not always tied to a clear ideology; they may include rejection of democratic values, antisemitism, and Islamophobia [10]. A persistent criticism, however, is



that the Directive lacks precise definitions of “glorification of terrorism” and “radicalization,” which potentially endangers fundamental rights and creates legal uncertainty.

France employs some of the strictest legislative and operational tools. Following major terrorist attacks, the Vigipirate system enhanced public security, and laws against “glorification of terrorism” and “provocation to terrorism” online were passed. France’s model is centralized, with deradicalization centers under state control and integrated into a large counterterrorism apparatus. Judicial oversight is crucial, especially when monitoring suspects or returnees from conflict zones. Prisons use religious correction programs to eliminate jihadist ideologies, including special units to prevent radical ideas from spreading among inmates. Still, audit reports indicate ongoing resource shortages and high recidivism rates [11].

Germany, through the “Hayat” program, focuses on social integration. Created in 2012, Hayat cooperates with families and communities, offering psychosocial support and professional advice rather than surveillance or coercive measures [12]. A distinct feature is family and community involvement: Hayat counselors analyze radicalization contexts and build networks by working with relatives. This interaction helps uncover non-ideological motives such as identity crises or social isolation. Returnees are assessed jointly by law enforcement and social workers. In 2025, the German government banned several extremist groups, both far-right and Islamist. Under the “Terrorist Online Content Act”, the Federal Criminal Police (BKA) issued 245 content removal orders to hosting providers in 2025 (down from 482 in 2024). Moreover, in November 2025, Germany established a permanent advisory council against extremism to protect Muslims and strengthen democratic order.

The Netherlands is debating a law that would criminalize “glorification of terrorism”. Critics warn that the undefined terms “terrorism” and “terrorist organization” could lead to arbitrary or politically motivated enforcement and discrimination against specific religious or political groups [13]. In the United Kingdom, the Terrorism Act and the Public Order Act are central tools. Islamist terrorism remains the primary threat, accounting for three-quarters of MI5’s workload and 64% of terrorism-related prisoners. A 2025 report by the International Federation for Human Rights (FIDH) found that the UK, US, France, and Germany have used counter-terrorism and anti-Semitism laws to suppress pro-Palestinian protests. The report condemned the adoption of protest-criminalizing laws, including a 2024 Conservative bill deemed unlawful [14].

The United States’ Patriot Act and the USA PATRIOT Improvement and Reauthorization Act grant the government broad powers to monitor communications,

conduct financial investigations, and impose administrative measures on both foreigners and citizens. However, these laws have been criticized for restricting civil liberties and enabling discrimination. Some provisions allowed warrantless surveillance of citizens’ private correspondence, a practice contested since the Act’s inception.

In the Middle East, Saudi Arabia’s 2017 Law of Combating Terrorist Crimes and its Financing defines terrorist crimes as any acts that disturb public order, destabilize society, threaten national unity, or undermine the governing system. Article 37 imposes between ten and thirty years’ imprisonment for providing weapons, explosives, or nuclear/chemical materials to a terrorist group. Nevertheless, reports indicate that the law has been used not only against radicals but also against regime critics and human rights defenders. Jordan’s Anti-Terrorism Law similarly faces concerns about political misuse; in 2025, three minors were convicted of terrorism for expressing solidarity with Gaza, facing severe charges including forming a terrorist organization and possessing explosives.

In Southeast Asia, Indonesia and the Philippines are actively updating their legislation. The Philippines proposed the “Anti-Terror Grooming and Radicalization Prevention Act” to counter recruitment, especially into communist groups. Indonesia’s 2025-2029 National Action Plan and its new Criminal Code include multiple articles on terrorism. The National Counterterrorism Agency (BNPT) identified 21,199 pieces of intolerant, radical, or terrorist content in 2025. Central Asian states such as Kazakhstan and Tajikistan have also developed systematic counter-radicalism laws. Uzbekistan has made steady progress. The 2018 Law “On combating extremism” prohibits the display, distribution, and storage of extremist materials and restricts access to them. Presidential Decree PF-6255 (July 1, 2021) approved the 2021–2026 National Strategy, which focuses on building effective counter-extremism mechanisms, eliminating financing sources, and uniting international and regional efforts. Uzbekistan’s Criminal Code contains key articles: Article 244² (extremism) and Article 244¹ (terrorism). In 2025, a draft law proposed new provisions criminalizing incitement to hatred, attacks on the constitutional order, mass disturbances, and participation in banned organizations. The Supreme Court announced in January 2025 that 1,389 online sources promoting extremism and terrorism had been blocked (up from 800 in January 2024), most of them on Telegram (713) and Instagram (226) [15].

Conclusion. International experience with counter-radicalism legislation demonstrates that an effective response requires a balanced approach. On one hand, states must take decisive action against any form of radical activity. On the other hand, they must protect



citizens' fundamental rights and freedoms. Ambiguous definitions of key terms such as "glorification of terrorism" and "radicalization" must be avoided; overly broad interpretations risk turning these laws into tools for political repression or silencing dissent, which even advanced democracies have experienced. Given the growing importance of digital platforms, governments should work closely with online services to remove extremist content and prevent its spread.

Uzbekistan possesses a solid legal foundation and has consistently pursued systematic reforms, including the 2018 Law "On combating extremism", the 2021–2026 National Strategy, and amendments to the Criminal and Administrative Codes. Proposals to amend Articles 244 and 244 and to introduce new provisions such as "Terrorist preparation" and "Participation in an extremist organization" will further improve the legal framework. However, as international examples show, relying solely on punitive measures is insufficient. Expanding educational and preventive programs, especially for youth, addressing the root socio-economic drivers of radicalization, and strengthening anti-financing systems are equally crucial. The ongoing "Spiritual and Educational Work Concept" systematically protects young people from radical influences. Close cooperation with the international community, exchange of best practices, and legal harmonization remain key to successfully countering the global threat of radicalism.

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