

Counter-Terrorism Policy in the ASEAN Region: Comparative Study of Malaysia and Indonesia

¹Mohamad Ismed, ²Basuki, ³Ramlani Lina Sinaulan, ⁴Suphaporn Akkapi

^{1,2}Jayabaya University, Indonesia

³Bhayangkara University, Indonesia, ⁴Rajamangala University of Technology
Krungthep, Thailand

Ismedismed@gmail.com¹, bsoeky@gmail.com², lina.sinaulan@dsn.ubharajaya.ac.id³,
supaphorn.a@mail.rmutk.ac.th⁴

ABSTRACT

This research aims to enrich the academic literature on counter-terrorism policies in the ASEAN region, focusing on a comparison between Malaysia and Indonesia. A qualitative method with a comparative study design is used to analyze the counter-terrorism policies of both countries to understand the differences, similarities, implementation, and effectiveness of the strategies applied. The results show that counter-terrorism policies in Malaysia and Indonesia reflect a strong commitment through comprehensive institutional structures, strict regulations, and diverse strategy implementations. In Indonesia, the policy tends to be repressive, influenced by domestic political dynamics and international pressures post the 2002 Bali Bombing. Malaysia adopts a more structured approach considering geographical and socio-political factors and utilizes strict legal frameworks like the Internal Security Act (ISA). Political factors are significant in policy formation in both countries, with Malaysia maintaining national stability through strong counter-terrorism policies. Social factors such as radicalization and extremism are also important, with Indonesia facing challenges from groups like Jamaah Islamiyah (JI) while Malaysia uses community-based approaches in its deradicalization programs. Comprehensive and coordinated strategies, increased inter-agency coordination, international cooperation, and integration of the private sector and media are needed to address the challenges.

Keywords: Public Policy, Terrorism, ASEAN, Indonesia, Malaysia

Introduction

The Southeast Asian region, known as ASEAN (Association of Southeast Asian Nations), faces serious challenges in the form of rapidly growing terrorism threats. These threats not only disrupt the political and security stability of member countries but also impact their economic and social development. Therefore, an in-depth study of counter-terrorism policies in this region is essential to understand and formulate effective strategies to combat terrorism. Terrorism in ASEAN has developed in various forms, from domestic threats by local extremist groups to the involvement of international terrorist networks such as ISIS. This shows that an effective approach to counter-terrorism requires comprehensive actions, including prevention, law enforcement, and deradicalization (Prakasa et al., 2021). The study by Gun Ju, titled "Terrorism Situation and Counter-Terrorism Police Cooperation in South Asia and Southeast Asia," indicates that the threat of terrorism in South and Southeast Asia is expected to continue in the future, influenced by ongoing conflicts, terrorist organization alliances, and technological advancements (Gu Jun, 2022).

According to the 2022 Global Terrorism Index (GTI) report, Indonesia experienced a significant increase in the number of deaths due to terrorism in 2021, despite a decrease in the number of attacks. Terrorist attacks in Indonesia decreased by 24%, but the number of deaths increased by 85%. In 2021, the average death rate per attack in Indonesia was 15, compared to 6 deaths per attack in 2020. These attacks were mostly carried out by separatist groups such

as the Free Papua Movement (OPM) and the West Papua National Liberation Army. Additionally, ISIS was responsible for two attacks, including one that killed four farmers, claimed to be targeted at Christians (Lutz & Lutz, 2013). On the other hand, Laos recorded the largest improvement in 2021, followed by China and Malaysia. For the first time since 2005, Laos did not record any terrorism incidents, with a terrorism threat score of zero. Thailand recorded the second highest number of deaths in the region since 2011, with a total of 776 deaths. However, the number of deaths due to terrorism has significantly decreased in Thailand. In 2021, Thailand only recorded seven terrorism-related deaths, which is half of the number of deaths in 2020 (Lutz & Lutz, 2013). This trend shows that the threat of terrorism in ASEAN is still significant, although some countries show a decrease in the number of attacks.

The threat of terrorism in the ASEAN region is not limited to land activities but also includes maritime terrorism. In regions like Mindanao, the Philippines, terrorist groups such as Abu Sayyaf Group have a strong tradition of maritime piracy, making them a significant threat to regional security (Sahrasad et al., 2018). This threat requires cooperation among ASEAN countries to ensure better maritime security. Indonesia has long been one of the ASEAN countries facing serious terrorism challenges. The history of terrorism in Indonesia can be traced back to the 1980s, where radical Islamic groups began to emerge and carry out a series of attacks. Malaysia and Indonesia, as the two largest and most influential countries in the ASEAN region, play a strategic role in counter-terrorism efforts. The importance of the roles of these two countries in maintaining regional stability and addressing the terrorism threat cannot be ignored. Since the early 2000s, Malaysia has adopted various policies and strategic measures to combat terrorism, including establishing counter-terrorism centers and enhancing international cooperation.

For example, Malaysia established the Southeast Asia Regional Centre for Counter-Terrorism (SEARCCT) in 2003, aimed at increasing the capacity of ASEAN countries in facing terrorism threats through training, research, and international cooperation (*"Southeast Asia Regional Centre for Counter-Terrorism (SEARCCT)"*, 2019). Additionally, as a member of the UN Security Council, Malaysia actively promotes resolutions related to counter-terrorism and international security. Malaysia's proactive foreign policy shows the country's commitment to facing the terrorism threat comprehensively (United Nations Security Council, 2024). Indonesia, with the largest population in ASEAN, also plays a key role in counter-terrorism efforts in the region. The terrorism threat in Indonesia began to receive serious attention after the Bali bombings in 2002, which became a turning point in the country's security and defense policy. Indonesia then formed the Special Detachment 88 (Densus 88), specifically handling terrorism cases (Wicaksana & Karim, 2023).

Indonesia's counter-terrorism policy includes a comprehensive approach, ranging from law enforcement to deradicalization programs. The Indonesian government cooperates with various countries and international organizations to strengthen national capacity in addressing the terrorism threat. For example, cooperation between Indonesia and Australia in the Jakarta Centre for Law Enforcement Cooperation (JCLEC) program has made significant contributions to training and enhancing the capacity of Indonesian law enforcement officers (Nasu & Tan, 2016). This research will add to the academic literature on counter-terrorism policies in the ASEAN region, particularly in the context of a comparison between Malaysia and Indonesia. This study will provide empirical data and analysis useful for academics, researchers, and policymakers interested in security and terrorism issues in Southeast Asia. Through a comparative analysis of counter-terrorism policies in Malaysia and Indonesia, this research will also contribute valuable insights to ASEAN's collective efforts in combating terrorism and maintaining regional stability and security.

Research Method

This research uses a qualitative approach with a comparative study design to analyze counter-terrorism policies in Malaysia and Indonesia. The comparative study was chosen to understand the differences and similarities in the policies, implementation, and effectiveness of counter-terrorism strategies in both countries. The qualitative approach allows for an in-depth exploration of the context, processes, and impacts of these policies. This approach prioritizes a holistic and contextual understanding of the phenomena being studied (Creswell, 2014). The data sources in this research consist of two types: primary data and secondary data. Primary data were obtained through policy documents in both countries. Meanwhile, secondary data includes official government documents, international agency reports, journal articles, and books relevant to the research topic (Yin, 2003). The main data collection technique in this research is the study of official documents such as laws, government regulations, and annual reports from relevant agencies in Malaysia and Indonesia (Bryman, 2016). For data analysis, the research uses comparative analysis techniques to compare counter-terrorism policies in Malaysia and Indonesia. This analysis involves systematic comparisons between policies, strategies, implementation, and outcomes from both countries. The goal is to identify best practices and weaknesses that can serve as the basis for future policy recommendations (Ragin, 1989). In this analysis, the researcher focuses on identifying key themes related to counter-terrorism policies in Malaysia and Indonesia and the factors that influence the implementation and effectiveness of these policies.

Result and Discussion

Counter-Terrorism Policy in Malaysia

1. Institutional Structure of Counter-Terrorism in Malaysia

The institutional structure of counter-terrorism in Malaysia consists of various bodies and institutions that have roles and responsibilities in preventing and handling terrorism threats. This structure includes law enforcement agencies, intelligence bodies, and a legal framework that supports counter-terrorism operations. The main components of the counter-terrorism institutional structure in Malaysia are as follows:

a. National Security Council (NSC)

The NSC is the main body that coordinates national security policies and actions in Malaysia, including counter-terrorism policies. The NSC is responsible for formulating strategies, providing directives, and coordinating counter-terrorism operations across the country (*Majlis Keselamatan Negara*, 2024). The NSC also plays a crucial role in establishing comprehensive security policies to address various threats to national security (Weiss, 2014).

b. Polis Diraja Malaysia (PDRM)

The PDRM has special units dedicated to handling terrorism, namely the Special Action Unit (UTK) and the Naval Special Forces (PASKAL) (*Polis Diraja Malaysia*, 2024). These units are equipped with special skills and equipment to handle complex terrorist situations. Additionally, the PDRM cooperates with international bodies to exchange intelligence information and conduct joint operations to combat international terrorism networks (Kwang et al., 2017).

c. Suruhanjaya Komunikasi dan Multimedia Malaysia (SKMM)

The SKMM oversees and regulates the use of communication and information technology in Malaysia. The SKMM works with other bodies to monitor and act on terrorist activities using the internet and social media to spread propaganda, recruit

members, and plan terrorist attacks. The SKMM also plays a role in digital literacy efforts to raise public awareness about the threat of online terrorism (Hamid, 2018).

2. Counter-Terrorism Regulations in Malaysia

Counter-terrorism regulations in Malaysia have undergone significant developments over the past few decades to address increasingly complex terrorism threats. These regulations cover various laws aimed at preventing and addressing terrorist activities, focusing on maintaining national security while striving not to violate human rights. Additionally, various laws and policies have been implemented to ensure national security while considering human rights. The history of counter-terrorism regulations in Malaysia can be traced back to the colonial era with the introduction of the Emergency Ordinance of 1948 aimed at addressing the communist threat (Hwang, 2003). After independence, Malaysia introduced the Internal Security Act (ISA) of 1960, which gave the government broad powers to detain individuals without trial if deemed a threat to national security (William Case, 2001). The ISA remained in effect until 2012 when it was finally repealed and replaced by the Security Offences (Special Measures) Act (SOSMA) 2012 (Tan, 2015). The main regulations currently governing counter-terrorism in Malaysia include SOSMA 2012, the Prevention of Terrorism Act (POTA) 2015, the Special Measures Against Terrorism in Foreign Countries Act 2015, and the Anti-Money Laundering and Anti-Terrorism Financing Act (AMLATFA) 2001.

a. Security Offences (Special Measures) Act 2012 (SOSMA)

SOSMA was introduced to replace the controversial Internal Security Act (ISA). SOSMA allows detention for up to 28 days for thorough terrorism investigations and requires all security cases to be tried in the High Court (Rueben Ananthan Santhana Dass, 2015).

b. Prevention of Terrorism Act 2015 (POTA)

POTA allows detention without trial for up to two years, which can be extended if deemed necessary by the authorities. This law also establishes the Prevention of Terrorism Board (POTB), responsible for overseeing and implementing counter-terrorism preventive measures. POTA allows detention without charge for up to 60 days for investigation and the issuance of detention orders for up to two years by the Prevention of Terrorism Board (POTB).

c. Anti-Money Laundering and Anti-Terrorism Financing Act 2001 (AMLATFA)

AMLATFA aims to prevent and combat money laundering and terrorism financing. This law establishes a framework for reporting suspicious transactions and sanctions for those involved in terrorism financing. Updates in 2014 strengthened this law by aligning it with international standards and global trends in handling terrorism financing (Abdul-Qadir Zubair et al., 2015).

3. Implementation of Counter-Terrorism Policies in Malaysia

In terms of implementation, Malaysia's counter-terrorism policies and strategies involve various approaches designed to address terrorism threats effectively while ensuring that the measures taken remain within legal frameworks and respect human rights.

a. Criminalization Approach

One of the significant changes in the implementation of counter-terrorism policies in Malaysia is the shift from an executive-based approach to a criminal justice approach. The criminal justice approach emphasizes the importance of a fair and transparent legal process. This includes an increase in prosecutions of terrorism suspects and the

creation of new offenses related to terrorism (Journal & Legal, 2022). Secara implementatif menunjukkan bahwa adanya penurunan jumlah penuntutan kasus terorisme signifikan dari 126 kasus pada tahun 2016 menjadi 1 kasus pada tahun 2022. In practice, this shows that there has been a significant decrease in the number of terrorism prosecutions from 126 cases in 2016 to 1 case in 2022, reflecting an increase in the effectiveness of law enforcement against terrorism suspects (Samuel, 2024).

b. Prevention of Terrorism Financing

Terrorism financing is a critical aspect of the implementation of counter-terrorism policies in Malaysia. The Anti-Money Laundering and Anti-Terrorism Financing Act 2001 (AMLATFA) was introduced to prevent and combat money laundering and terrorism financing. The number of suspicious transaction reports increased significantly from 200 reports in 2010 to 1400 reports in 2022, reflecting an improvement in the detection and prevention of terrorism financing through AMLATFA's strict reporting framework (Abdul-Qadir Zubair et al., 2015).

c. Rehabilitation and Deradicalization Programs

The rehabilitation and deradicalization programs conducted by the Royal Malaysia Police's Counter-Terrorism Division (PDRM) have been effective in reducing terrorism incidents and militant recruitment. These programs involve comprehensive rehabilitation processes for former Daesh detainees, including education, counseling, skills training, and lifelong monitoring (Saidin & Khalid, 2023). The success rate of rehabilitation programs has shown consistent improvement, even though there were significant increases in terrorism-related arrests in 2014 and 2016, from 60 to 120 cases. However, since 2017, the number of arrests has shown a downward trend, with terrorism arrests reaching the lowest point in 2020. This indicates the effectiveness of deradicalization and reintegration programs for former militants into society.

d. Our Eyes Initiative Policy

Malaysia participates in the ASEAN Our Eyes Initiative (OEI), which involves the exchange of intelligence information related to terrorism and radicalization. This cooperation has shown positive results in enhancing regional coordination to address terrorism threats. OEI has helped effectively identify and address terrorism threats through information exchange and operational cooperation among ASEAN countries. To assess the success rate of this policy, two main indicators are presented: the number of terrorism incidents and intelligence exchanges and the number of foiled attack plans.

The number of intelligence data exchanges increased significantly from 15 in 2018 to 35 in 2022. The number of terrorism incidents showed a decrease, from 15 incidents in 2016 to 3 incidents in 2022. Meanwhile, the number of foiled attack plans increased from 2 plans in 2016 to 8 plans in 2022 (Chastiti Mediafira Wulolo; Tri Legionosuko; Suhirwan; Yusuf, 2019).

Counter-Terrorism Policy in Indonesia

Indonesia's counter-terrorism policy is a response to the growing threat of terrorism from both domestic and international sources. The Indonesian government's efforts to combat terrorism cover various aspects, from prevention and enforcement to rehabilitation. Indonesia's counter-terrorism policy is supported by a comprehensive institutional structure involving various government agencies and cooperation with the international community.

1. Institutional Structure of Counter-Terrorism in Indonesia

As the country with the largest Muslim population in the world, Indonesia has become a target for both international and domestic terrorist groups. To address this threat, Indonesia has established various institutions and counter-terrorism structures. The history of counter-terrorism efforts in Indonesia can be traced back to the New Order era, where the government took harsh steps to suppress radical movements. However, the significant formation of specialized counter-terrorism institutions only began after the Bali bombings in 2002. These attacks prompted the government to take more decisive and organized action against terrorism (Abuza, 2006). The institutional structure of counter-terrorism in Indonesia involves various agencies and institutions working synergistically to address the terrorism threat. The following are the main components of Indonesia's counter-terrorism institutional structure:

a. Indonesian National Police (POLRI)

POLRI holds the primary role in law enforcement and handling terrorism cases in Indonesia. Special units such as the Special Detachment 88 (Densus 88) were established to handle terrorism threats directly. Densus 88 is responsible for arrest operations, investigations, and prosecutions of terrorism suspects (Suatmiati & Kastro, 2020).

b. Indonesian National Armed Forces (TNI)

TNI plays an important role in counter-terrorism efforts, although the primary responsibility for internal security was transferred to POLRI in 1999. TNI is involved in special military operations aimed at handling terrorism threats in certain areas, especially in border regions and conflict zones (Muhamad Haripin, Chaula Rininta Anindya, 2020).

c. National Counter-Terrorism Agency (BNPT)

BNPT is the main body responsible for coordinating all counter-terrorism efforts in Indonesia. BNPT conducts various activities, ranging from prevention, enforcement, to deradicalization. BNPT cooperates with various government agencies, both at the central and regional levels, as well as with the international community (Susetyo, 2018).

d. Ministry of Law and Human Rights

The Ministry of Law and Human Rights plays a crucial role in formulating policies and regulations related to counter-terrorism. They are responsible for the legal aspects of detention and trial processes for terrorism suspects, ensuring that these actions comply with human rights standards (Yanto, 2024).

e. State Intelligence Agency (BIN)

BIN plays a key role in gathering and analyzing intelligence related to terrorism threats. The information obtained by BIN is essential for preventing terrorism attacks and supporting law enforcement operations conducted by POLRI and TNI (Siddha & Benarrivo, 2023).

2. Counter-Terrorism Regulations in Indonesia

Counter-terrorism regulations in Indonesia have undergone significant developments over the past few decades, especially after major terrorist attacks that shook the country. The existing legal framework serves as a legal basis for preventing, enforcing, and combating terrorism.

a. Undang-Undang Nomor 5 Tahun 2018

Undang-Undang Nomor 5 of 2018 on the Eradication of Terrorism Crimes is a revision of Undang-Undang Nomor 15 of 2003. This revision provides a stronger and more comprehensive legal basis for counter-terrorism, including expanding the definition

of terrorism, increasing law enforcement powers, and introducing new mechanisms for prevention and deradicalization (Yanto, 2024). This law expands the authority of law enforcement agencies, including the Indonesian National Police (POLRI) and the Indonesian National Armed Forces (TNI), to conduct arrests, detentions, and investigations of terrorism suspects. The increased authority aims to provide flexibility and effectiveness in handling terrorism cases (Muhamad Haripin, Chaula Rininta Anindya, 2020).

b. Peraturan Pemerintah Pengganti Undang-Undang (Perppu) No. 1 Tahun 2002

Perppu No. 1 of 2002 on the Eradication of Terrorism Crimes, later ratified into law, is one of the first regulations providing a strong legal framework for countering terrorism in Indonesia. This regulation allows for the detention of terrorism suspects without trial for a certain period, giving law enforcement agencies time to gather sufficient evidence. This Perppu allows for the detention of terrorism suspects for 7 days without trial, which can be extended up to 6 months if necessary. This provision provides flexibility for law enforcement agencies in handling complex terrorism cases (Suatmiati & Kastro, 2020).

c. Peraturan Pemerintah No. 77 Tahun 2019

Government Regulation No. 77 of 2019 concerning the Prevention and Handling of Criminal Acts of Terrorism strengthens the role of the National Counterterrorism Agency (BNPT) in coordinating prevention and counter-terrorism efforts. This regulation also governs cooperation between government agencies, private institutions, and the community in counter-terrorism efforts. This regulation emphasizes the importance of coordination between various government agencies and other institutions in counter-terrorism efforts. BNPT is mandated to lead this coordination and ensure that all efforts run synergistically (Susetyo, 2018).

3. Implementation of Counter-Terrorism Policies in Indonesia

Indonesia adopts a combination of hard and soft approaches in its counter-terrorism policies, reflecting a comprehensive strategy to address the terrorism threat. These hard and soft approaches are designed to operate synergistically, ensuring an effective response to various aspects of the terrorism threat.

a. Hard Approach

The hard approach in Indonesia's counter-terrorism policy involves direct, repressive actions such as arrests, investigations, and prosecutions of individuals suspected of being involved in terrorism activities. The Special Detachment 88 (Densus 88), an elite unit under the Indonesian National Police (POLRI), is the main actor in implementing this approach. Densus 88 is empowered to conduct counter-terrorism operations that include the use of military force and strict law enforcement against terrorist groups (Putu & Pradnyana, 2022). This unit has shown its effectiveness through various successful operations targeting domestic and international terrorism networks.

Based on data from I-KHub BNPT Counter Terrorism and Violent Extremism Outlook, the total number of terrorism attacks during the 2018-2022 period reached 49 incidents. Additionally, the number of terrorism-related arrests (terrorism crimes) from 2000 to the end of 2015 shows that a total of 1,143 individuals have been arrested and legally processed. This data illustrates the intensity and continuity of law enforcement efforts in addressing the terrorism threat in Indonesia for over a decade (Khoirunnisa, 2024).

b. Soft Approach

The soft approach emphasizes preventive measures and deradicalization programs aimed at changing radical thinking and facilitating the reintegration of former terrorists into society (Of et al., 2023). Deradicalization programs in Indonesia include education, counseling, and skills training, all designed to help individuals involved in terrorism activities abandon their extremist ideologies and return to normal life. These programs also involve cooperation with various government agencies, non-governmental organizations, and local communities to ensure ongoing support for former terrorists in their reintegration process. According to Commissioner Aswin Siregar, the number of terrorism arrests in Indonesia has significantly decreased from 248 cases in 2022 to 142 cases in 2023. This decline in arrest numbers can be attributed to effective efforts by Special Detachment 88 (Densus 88) and BNPT in preventing terrorism acts in Indonesia.

c. International Cooperation

International cooperation is also a crucial element in Indonesia's counter-terrorism strategy. One important form of cooperation is intelligence information exchange. Through ASEAN, Indonesia participates in the *ASEAN Ministerial Meeting on Transnational Crime* (AMMTC) which focuses on collective efforts to combat transnational crimes, including terrorism. This intelligence information exchange helps Indonesia identify and capture individuals and terrorist groups operating in the ASEAN region. Interpol membership also provides Indonesia access to international databases on terrorists and terrorist organizations, which is essential for preventive efforts. Additionally, Indonesia cooperates with the PBB, particularly through the *United Nations Counter-Terrorism Committee (UNTC)*, following global policy developments and implementing PBB resolutions related to counter-terrorism. This active participation allows Indonesia to adopt international best practices and adapt them to local contexts (Muhammad, 2011).

Analysis of Counter-Terrorism Policies in Malaysia and Indonesia

Counter-terrorism policies in Malaysia and Indonesia can be explained through several relevant public policy theories, including the Multiple Streams Framework (MSF) by John Kingdon. The Multiple Streams Framework (MSF) is a public policy theory that identifies three main streams in the policy process: *problem stream*, *policy stream*, and *politics stream*. These three streams operate independently but can converge at certain points, called "*policy windows*," which enable policy changes (Kingdon, 1995).

In Malaysia, the terrorism threat (*problem stream*) has been a major driver for the government to formulate comprehensive counter-terrorism policies. Terrorism incidents and evolving threats necessitate urgent and effective policies. The Malaysian government responds by developing a strong policy framework (*policy stream*) that includes the establishment of bodies such as the National Security Council (NSC), the implementation of the Security Offences (*Special Measures*) Act 2012 (SOSMA), and the Prevention of Terrorism Act 2015 (POTA). Strong political support (*politics stream*) also plays a crucial role in policy implementation, with the government receiving legislative and executive backing to implement stringent measures against terrorism.

The establishment of the NSC, SOSMA, and POTA reflects the government's efforts to integrate these three streams in responding to the terrorism threat. The NSC serves as the main body coordinating national security policies and actions, including counter-terrorism policies, while SOSMA and POTA provide the legal framework for detaining and prosecuting

terrorism suspects without trial for a certain period. This combination demonstrates how the three streams in the MSF can come together to create responsive policies against terrorism threats in Malaysia.

In Indonesia, the Bali bombings in 2002 (*problem stream*) became a critical momentum that triggered significant changes in counter-terrorism policies. This incident highlighted Indonesia's vulnerability to terrorism threats and the urgent need for stronger policies. The government responded by adopting regulations such as Law No. 5 of 2018 on the Eradication of Terrorism Crimes and establishing the National Counter-Terrorism Agency (BNPT) (*policy stream*). Strong political support for counter-terrorism efforts (*politics stream*) also bolstered the implementation of these policies, with the Indonesian government receiving support from various political parties and legislative bodies to take stronger actions against terrorism. Undang-Undang Nomor 5 Tahun 2018 expands the definition of terrorism and increases the authority of law enforcement agencies, including POLRI and TNI, to arrest and detain terrorism suspects. BNPT is responsible for coordinating all counter-terrorism efforts in Indonesia, ensuring effective cooperation among various government agencies. These changes demonstrate how the three streams in the MSF can come together to create responsive policies against terrorism threats in Indonesia (Kingdon, 1995).

Besides the Multiple Streams Framework (MSF) by John Kingdon, the counter-terrorism policies in Indonesia and Malaysia can also be analyzed through the Advocacy Coalition Framework (ACF) by Paul Sabatier. The Advocacy Coalition Framework (ACF) is a public policy theory focusing on the role of advocacy coalitions in the policy process. These coalitions consist of various actors sharing the same beliefs and goals in a particular policy area. ACF emphasizes the importance of interactions between advocacy coalitions in influencing policy formulation and implementation (Paul A. Sabatier and Hank C. Jenkins-smith, 1995). In Malaysia, advocacy coalitions consisting of various government bodies, law enforcement agencies, and international organizations play a role in developing and implementing counter-terrorism policies. Cooperation between the NSC, PDRM, MCMC, and international bodies such as Interpol reflects this coalition approach. The NSC serves as the main body coordinating national security policies and actions, while PDRM and MCMC play crucial roles in law enforcement and monitoring communication technology. This advocacy coalition works together to ensure that Malaysia's counter-terrorism policies are based on accurate intelligence information and effective law enforcement. Support from international bodies such as Interpol also helps Malaysia identify and act on international terrorism threats. This cooperation reflects the importance of advocacy coalitions in creating effective and comprehensive policies.

In Indonesia, advocacy coalitions involving POLRI, TNI, BNPT, BIN, and international organizations such as ASEAN and the UN play a crucial role in formulating and implementing counter-terrorism policies. POLRI, through its Special Detachment 88 (Densus 88), and TNI cooperate in operations to arrest and prosecute terrorism suspects. BNPT coordinates counter-terrorism efforts at the national level, while BIN provides the necessary intelligence to support law enforcement operations. International cooperation through ASEAN and the UN helps Indonesia develop policies that align with international standards and best practices. Intelligence information exchange with ASEAN member countries and the UN enables Indonesia to identify and act on terrorism threats more effectively. This advocacy coalition works together to ensure that Indonesia's counter-terrorism policies are based on human rights principles and national security. The counter-terrorism policies in Malaysia and Indonesia show that the Multiple Streams Framework and Advocacy Coalition Framework can be used to understand the dynamics and complexities of the policy process in both countries. The Multiple Streams Framework highlights the importance of integrating

problem, policy, and politics streams in creating responsive policies against terrorism threats. The Advocacy Coalition Framework shows how advocacy coalitions can play a crucial role in developing and implementing effective policies.

Factors Influencing Counter-Terrorism Policies in Indonesia and Malaysia

Based on research findings, counter-terrorism policies in Malaysia and Indonesia show significant differences in their approaches to addressing terrorism. Indonesia's counter-terrorism policies are more repressive, driven by international influence and past experiences shaping the perception of terrorism threats. In handling this, Indonesia tends to use intensive military and police force, often leading to human rights violation discourses. On the other hand, Malaysia adopts a more structured approach, considering geographical configurations and socio-political variables in developing its security policies.

Furthermore, counter-terrorism policies in Indonesia and Malaysia are influenced by a series of complex and interrelated factors encompassing political, government system, social, economic, and cultural aspects. The following are some factors influencing counter-terrorism policies in both countries:

1. Political Factors

In Indonesia, counter-terrorism policies are heavily influenced by domestic and international political dynamics. After the 2002 Bali bombings, Indonesia adopted a harsher stance against terrorism. International pressure, especially from the United States, pushed the Indonesian government to implement stricter counter-terrorism laws and conduct arrests of terrorism perpetrators. Additionally, these policies are influenced by changes in government and political priorities in addressing terrorism threats (Fahmi, 2022). In Malaysia, counter-terrorism policies tend to be more stable and centralized, influenced by strong political power and government stability. This approach is evident in the use of the Internal Security Act (ISA), even though it has now been replaced by new laws still emphasizing strict control over terrorism threats. The Malaysian government uses counter-terrorism policies to maintain political and social stability and ensure national security (Ongge, 2015).

2. Social Factors

In a social context, Indonesia faces challenges related to radicalization and extremism involving various ethnic and religious groups. Terrorism networks like Jamaah Islamiyah (JI) have played a significant role in influencing counter-terrorism policies. Deradicalization programs often encounter obstacles due to a lack of community participation and minimal support from the private sector (Subagyo, 2021). These factors highlight how social dynamics and community involvement can affect the effectiveness of counter-terrorism policies. In Malaysia, social factors related to addressing extremism involve a more inclusive community-based approach. The Malaysian government undertakes various efforts to address extremism through education and deradicalization programs involving various societal layers. However, issues of intolerance and policies often perceived as discriminatory against minority groups also influence the perception and effectiveness of counter-terrorism policies (Saat, 2023).

3. Government System Factors

Indonesia is a unitary state with a republican government system. Indonesia's political system is heavily influenced by ethnic and religious diversity, creating complex political dynamics. The country consists of more than 300 ethnic groups, with the Javanese being the largest ethnic group dominating national politics. The long history

of centralized power under the New Order regime reinforced Javanese dominance, which is still felt today. This factor causes national policies to often be influenced by the interests of the dominant group, potentially neglecting the interests of other ethnic groups (Ariyanto et al., 2013). Additionally, religious pluralism in Indonesia also plays a crucial role in policy formation. The majority of Indonesia's population is Muslim, but there are also significant communities of Christians, Catholics, Hindus, Buddhists, and Confucians. This religious diversity causes the government to be cautious in formulating policies to avoid inter-religious tensions. This challenge is further exacerbated by the emergence of radical movements using religion as a tool to achieve political goals. Indonesia's counter-terrorism policies often have to consider religious sensitivities to maintain national stability (Messmer & Yordán, 2001).

Malaysia, on the other hand, is a federal state with a constitutional monarchy system. The federal government structure provides certain autonomy to the states, which can affect the implementation of national policies, including counter-terrorism policies. This federal system allows states to have policies tailored to local needs, but it can also pose coordination challenges with the central government. Malaysia's constitutional monarchy, consisting of Malay rulers, also has significant influence in politics and national policies. This system allows for the preservation of traditional structures while adopting modern elements in governance (Yazid, 2014). Dualism in economic and social development in Malaysia also influences national policies. On one side, the government encourages modernization and industrialization to enhance economic growth. On the other side, there are efforts to preserve traditional values and structures rooted in Malay culture. Policies supporting cultural preservation often aim to maintain social harmony amid Malaysia's ethnic diversity. However, this dualism can create tensions, especially when modernization policies are seen as threatening local traditions or when cultural preservation is perceived as hindering economic progress (Saat, 2023).

Challenges and Recommendations for Improving Counter-Terrorism Policies in Indonesia and Malaysia

Terrorism is a significant threat requiring comprehensive and coordinated policy responses. Indonesia and Malaysia, as two major countries in Southeast Asia, face complex and multifaceted challenges in developing and implementing effective counter-terrorism policies. The following is an in-depth analysis to provide deep insights into these challenges and offer strategic recommendations to enhance the effectiveness of counter-terrorism policies in both countries.

1. Indonesia

a. Inter-Agency Coordination

One of the main challenges in Indonesia's counter-terrorism policies is the lack of effective coordination among law enforcement and intelligence agencies. For example, the Thamrin bombing in 2016 revealed coordination deficiencies among agencies, leading to delays in response and handling emergency situations. These coordination gaps hinder the exchange of vital information needed to prevent terrorist attacks. Institutional fragmentation is a deep structural issue affecting the country's response to terrorism threats (Mahyudin, 2016). To address this challenge, improved coordination through better information technology use and the establishment of effective coordination mechanisms is needed. Joint training and capacity-building for law enforcement agencies can strengthen inter-

institutional synergy. Implementing an integrated information management system will enable real-time data exchange, enhancing responsiveness to terrorism threats. For instance, developing an integrated communication platform accessible to all relevant agencies for quick intelligence information sharing.

b. Foreign Influence and Bilateral Relations

International cooperation with countries like the United States and Australia is crucial in strengthening Indonesia's counter-terrorism policies. However, wise management of foreign influence is necessary to ensure that such cooperation does not undermine national sovereignty. For example, on April 3, 2005, President Susilo Bambang Yudhoyono (SBY) made an official visit to Australia, resulting in an agreement for joint military training in the fight against international terrorism. Australia, concerned about terrorism threats from groups like Jamaah Islamiyah allegedly operating in Indonesia, saw this cooperation as essential. Furthermore, Australia's international profile as a US ally in the wars in Afghanistan and Iraq made security cooperation with Indonesia a significant achievement for Prime Minister John Howard. Meanwhile, for Indonesia, this visit was used to express objections to travel warnings damaging Indonesia's international image. This indicates that Australia's interests were greater compared to Indonesia.

c. Radicalization and Deradicalization

Indonesia's deradicalization programs face significant hurdles due to a lack of community and private sector engagement. A clear example is the low participation rate of businesses and media in deradicalization programs, resulting in a limited and shallow impact. Minimal involvement from businesses and media leads to less effective and comprehensive program implementation.

To overcome this challenge, integrating the private sector and media into deradicalization programs to enhance community participation and program reach is essential. Collaboration with civil society organizations can also strengthen deradicalization efforts. Developing community-based initiatives involving religious leaders and community leaders will increase the effectiveness of deradicalization programs through more personal and local approaches. For instance, deradicalization programs can involve large companies in providing job training for former terrorists, giving them opportunities for social and economic reintegration.

2. Malaysia

a. Legal Framework

Malaysia has made improvements in its legal framework to combat terrorism financing. However, the implementation of these laws often faces challenges in harmonizing with international standards and local needs. For example, the Prevention of Terrorism Act 2015 has helped strengthen the country's legal framework in addressing evolving terrorism threats, but its implementation sometimes conflicts with internationally recognized human rights principles (Mahyudin, 2016). Therefore, periodic regulatory revisions are necessary to adjust to the latest threat dynamics. Additionally, periodic evaluations of law implementation are needed to ensure its effectiveness. Strengthening internal and external oversight mechanisms will ensure laws are applied fairly and effectively. For instance, establishing an independent commission to monitor and assess the implementation of counter-terrorism laws periodically.

b. Dualism in Development

The dualism between modernization and preservation of traditional structures can create tensions in implementing counter-terrorism policies. For example, economic modernization efforts in Malaysia often conflict with efforts to preserve local culture and traditions, potentially creating social and political tensions. These tensions can hinder counter-terrorism efforts, given the importance of balancing economic progress with cultural values (Yazid, 2014). An integrative approach harmonizing economic progress with cultural preservation is an effective strategy to achieve this goal. Inclusive and participatory policy-making will ensure all stakeholders are involved in the development process, reducing potential conflicts and increasing community support. For example, sustainable development programs that consider cultural and traditional aspects in each planning and implementation stage.

c. Intolerance and Discrimination

Issues of intolerance and discrimination against minority groups can hinder the effectiveness of counter-terrorism policies. For example, policies perceived as discriminatory against certain ethnic communities can trigger dissatisfaction and radicalization among these communities (Saat, 2023). Therefore, implementing an inclusive approach involving all ethnic and religious groups in the policy-making process to address intolerance and discrimination issues is crucial. Education and public awareness campaigns can help reduce negative sentiments toward minority groups and strengthen social cohesion. Education programs emphasizing tolerance and diversity values should be integrated into school curriculums to build a more inclusive and harmonious society. For example, education initiatives involving tolerance and diversity training in schools and public campaigns promoting harmony among ethnic groups.

Conclusion

Counter-terrorism policies in Malaysia and Indonesia demonstrate a strong commitment from both countries to address terrorism threats through comprehensive institutional structures, strict regulations, and diverse strategy implementations. In practice, counter-terrorism policies in Indonesia and Malaysia show significant differences in their approaches to terrorism threats. Indonesia tends to adopt a repressive approach influenced by domestic political dynamics and international pressures post the 2002 Bali bombings. In contrast, Malaysia adopts a more structured approach, considering geographical and socio-political factors, and uses strict legal frameworks such as the Internal Security Act (ISA) and its successor laws. Political factors play a significant role in the formation of counter-terrorism policies in both countries. In Indonesia, these policies are influenced by domestic political dynamics, international relations, and government changes. Malaysia, with stronger political stability, uses counter-terrorism policies to maintain national and social stability. Social factors such as radicalization and extremism also play important roles, with Indonesia facing challenges from terrorist groups like Jamaah Islamiyah (JI), while Malaysia emphasizes community-based approaches in its deradicalization programs.

Differences in government systems also influence counter-terrorism policies. Indonesia, with its complex republic system, has to consider ethnic and religious sensitivities in its counter-terrorism policies. Malaysia, with its constitutional monarchy and federal structure, faces challenges in coordinating policies across different states. Efforts to address these challenges involve improving inter-agency coordination, wise management of foreign

influence, and integrating the private sector and media in deradicalization programs in Indonesia, as well as harmonizing legal frameworks and inclusive approaches to intolerance and discrimination issues in Malaysia. To address these challenges, both Indonesia and Malaysia need to adopt more comprehensive and coordinated strategies. In Indonesia, improving inter-agency coordination among law enforcement and intelligence agencies is crucial to enhance the response to terrorism threats. Additionally, international cooperation with other countries can strengthen counter-terrorism policies. The private sector and media should also be involved in deradicalization programs to increase community participation. In Malaysia, harmonizing regulations with international standards and inclusive approaches to intolerance and discrimination will enhance the effectiveness of counter-terrorism policies. Education and public awareness campaigns can help reduce negative sentiments toward minority groups and strengthen social cohesion.

Bibliography

- Abdul-Qadir Zubair, A., Oseni, U. A., Mohd Yasin, N., & Ibrahim, A. (2015). Anti-Terrorism Financing Laws in Malaysia: Current Trends and Developments Undang-Undang Pembiayaan Anti-Keganasan Di Malaysia: Halatuju Dan Perkembangan Terkini Abstrak. *Iium Law Journal*, 23(1), 149–170.
- Abuza, Z. (2006). Political Islam and violence in Indonesia. In *Political Islam and Violence in Indonesia*. <https://doi.org/10.4324/9780203969250>
- Ariyanto, A., Darmawan, D. D., & Nugroho, G. S. (2013). Pengaruh Sistem Politik Masyarakat Jawa Terhadap Sistem Politik di Indonesia. *Law, Society, Islamic Civilization*, 1(1), 1–16.
- Bryman, A. (2016). *Social Research Methods*. (Oxford University Press.
- Chastiti Mediafira Wulolo; Tri Legionosuko; Suhirwan; Yusuf. (2019). Opportunities and Optimization of the Our Eyes Initiative as the Strategy for Counter-Terrorism in ASEAN. *International Journal of Law and Political Sciences*, 13(1), 1–6. <https://doi.org/10.5281/zenodo.3607720>
- Creswell, J. W. (2014). Research Design: Qualitative, Quantitative, and Mixed Methods Approaches. In *Research Design* (Vol. 4, Issue June).
- Fahmi, M. Y. (2022). Strategi Kontra Terorisme di Indonesia Dua Dekade Terakhir: Pendekatan Soft dan Hard Strategy. *JRP (Jurnal Review Politik)*, 12(April), 39–61.
- Gu Jun. (2022). Terrorism Situation and Counter-Terrorism Police Cooperation in South Asia and Southeast Asia,. *Journal of Asia Social Science*, 7(3).
- Hamid, M. Z. M. & A. F. A. (2018). The Rise of Radicalism and Terrorism in Indonesia and Malaysia. *Review of Islam in Southeast Asia*, 53(9), 1689–1699.
- Hwang, I. (2003). *Personalized Politics: The Malaysian State Under Mahathir* (Institute). (Institute of Southeast Asian Studies).
- Journal, U. U. M., & Legal, O. F. (2022). MALAYSIA ' S COUNTER-TERRORISM POLICY: SHIFTING FROM THE EXECUTIVE-BASED TO THE CRIMINAL JUSTICE APPROACH? Mukhriz Mat Rus School of Law , College of Law , Government and International Studies. 1(1), 409–429.
- Khoirunnisa, J. (2024). BNPT Sebut Tren Kasus Terorisme di Indonesia Turun dari Tahun ke Tahun.
- Kingdon, J. W. (1995). *Agendas, Alternatives, and Public Policies*. HarperCollins College

Publishers.

- Kwang, H. P., Sabaruddin, J. S., & Dhanapal, S. (2017). Crafting Anti-Terrorism Law in Malaysia: Striking a Delicate Balance Between National Security and Personal Liberty. *IJUM Law Journal*, 25(1), 1–28. <https://doi.org/10.31436/iiumlj.v25i1.287>
- Lutz, J. M., & Lutz, B. J. (2013). Global terrorism. *Global Terrorism*, 1–359. <https://doi.org/10.4324/9780203731321>
- Mahyudin, E. (2016). An Overview upon the Challenge of Intelligence in Counter-Terrorism in Indonesia. *Intermestic: Journal of International Studies*, 1(1), 23–35. <https://doi.org/10.24198/intermestic.v1n1.3>
- Majlis Keselamatan Negara. (2024).
- Messmer, W. B., & Yordán, C. L. (2001). *The Origins of the United Nations ' Global Counter-Terrorism System*. January, 1–20.
- Muhamad Haripin, Chaula Rininta Anindya, and A. P. (2020). "The Politics of Counter-Terrorism in Post-Authoritarian States: Indonesia's Experience,. *Defense & Security Analysis*, 36(3).
- Muhammad, A. (2011). *INTERNATIONAL CONTEXT OF INDONESIA ' S COUNTER-TERRORISM POLICY , 2001 - 2004*. 2001–2004.
- Nasu, H., & Tan, S. (2016). ASEAN and the development of counter-terrorism law and policy in Southeast Asia. *The University of New South Wales Law Journal*, 39(January), 1219.
- Of, E., Government, T. H. E., The, O. F., Of, R., In, I., Sense, C. A., Security, O. F., The, F. O. R., From, S., & Threat, T. H. E. (2023). *Edunity COMMUNITY AND STATE FROM THE THREAT OF*. 2(11), 1308–1314.
- Ongge, O. (2015). The Dynamics of Indonesia-Malaysia Bilateral Relations Since Independence: Its Impact on Bilateral and Regional Stability. *Asian Conference on Asian Studies 2015 Official Conference Proceeding Abstract*.
- Paul A. Sabatier and Hank C. Jenkins-smith. (1995). Policy Change And Learning: An Advocacy Coalition Approach. In *Perspectives on Political Science*. Avalon Publishing.
- Polis Diraja Malaysia. (2024). <https://www.rmp.gov.my/infor-korporate/polis-diraja-malaysia>
- Prakasa, S. U. W., Al-Fatih, S., & Haqqi, A. R. A. (2021). Terrorism Eradication in ASEAN Countries: Human Rights Perspective. In *Al-Ihkam: Jurnal Hukum dan Pranata Sosial* (Vol. 16, Issue 2). <https://doi.org/10.19105/AL-LHKAM.V16I2.5021>
- Putu, I., & Pradnyana, H. (2022). *Enhancing the Role of Hard Approach and Soft Approach Counter-Terrorism Strategy in Indonesia*. 4(2), 25–58.
- Ragin, C. C. (1989). *The Comparative Method: Moving Beyond Qualitative and Quantitative Strategies*. University of California Press. <https://doi.org/10.1086/229365>
- Rueben Ananthan Santhana Dass, J. S. (2015). Terrorism Laws in Malaysia: The Continuing Case for SOSMA and POTA. *Security and Conflict in East Asia*.
- Saat, N. (2023). "The Impact of Non-Violent Muslim Extremism: Reflections on Indonesia and Malaysia,." *Muslim Politics Review*, 2(1), 56–58. <https://doi.org/https://doi.org/10.56529/mpr.v2i1.141>

- Sahrasad, H., Chaidar, A., Akmal, M., Ali, S., Amalia, N., & Quthni Effida, D. (2018). Maritime Terrorism Network: Threat and Security in Contemporary Southeast Asia. *Walisono: Jurnal Penelitian Sosial Keagamaan*, 26(1), 115. <https://doi.org/10.21580/ws.26.1.2274>
- Saidin, M. I. S., & Khalid, K. A. T. (2023). Combating Daesh: Insights into Malaysia's Counter-Terrorism Experience and the Deradicalisation of Former Detainees. *Religions*, 14(3), 1–19. <https://doi.org/10.3390/rel14030367>
- Samuel, T. K. & R. A. S. D. (2024). *Terrorism and Counter Terrorism in Malaysia in a Post-Pandemic Environment*. <https://www.rsis.edu.sg/ctta-newsarticle/terrorism-and-counter-terrorism-in-malaysia-in-a-post-pandemic-environment/>
- Siddha, A., & Benarrivo, R. (2023). Counter Cyber Terrorism Governance In Indonesia. *Khazanah Sosial*, 5(2), 359–367. <https://doi.org/10.15575/ks.v5i2.26414>
- Suatmiati, S., & Kastro, E. (2020). Legal and Institutional Framework on Counter-Terrorism in Indonesia. *Jurnal Media Hukum*, 27(1), 68–78. <https://doi.org/10.18196/jmh.20200143>
- Subagyo, A. (2021). "The Implementation of the Pentahelix Model for the Terrorism Deradicalization Program in Indonesia,." *Cogent Social Sciences*, 7(1), 142–144.
- Susetyo, H. (2018). Counter Terrorism and Human Rights Violation in the Aftermath of Terrorism in Indonesia. *Hukum Pidana Dan Pembangunan Hukum*, 1(1). <https://doi.org/10.25105/hpph.v1i1.3539>
- Southeast Asia Regional Centre for Counter-Terrorism (SEARCCT). (2019). <https://www.searcct.gov.my/pengenalan/>.
- Tan, A. T. H. (2015). Security and Conflict in East Asia. In *Security and Conflict in East Asia*. <https://doi.org/10.4324/9781315850344>
- United Nations Security Council. (2024). *Counter-Terrorism Committee Concludes Assessment Visit to Malaysia | Security Council - Counter-Terrorism Committee (CTC)*. Counter-Terrorism Committee (CTC). <https://www.un.org/securitycouncil/ctc/news/counter-terrorism-committee-concludes-assessment-visit-malaysia>.
- Weiss, M. L. (2014). Routledge handbook of contemporary Malaysia. In *Routledge Handbook of Contemporary Malaysia*. <https://doi.org/10.4324/9781315756240>
- Wicaksana, I. G. W., & Karim, M. F. (2023). How regional organisation survives: ASEAN, hedging and international society. *Contemporary Politics*, 29(5), 659–679. <https://doi.org/10.1080/13569775.2023.2216031>
- William Case. (2001). "Malaysia's General Elections in 1999: A Consolidated and High-quality Semi- democracy,." *Asian Studies Review*, 25(1), 665.
- Yanto, Y. (2024). Analysis of Legal Structural Protection of Terrorism Crimes in Indonesia Based on Legal System Theory. *Journal of Legal and Cultural Analytics*, 3(2), 117–126. <https://doi.org/10.55927/jlca.v3i2.9017>
- Yazid, M. N. M. (2014). "Colonial Policy and the Impact to the Politico-Economy Stability after Independence: The Case of Indonesia under the Dutch and Malaysia under the British,." *Review of History and Political Science*, 92–94. <https://doi.org/https://doi.org/10.15640/rhps.v2n3-4a4>
- Yin, R. K. (2003). *Case Study Research: Design and Methods*.