

Preventing and Countering Violent Extremism: The Singapore Approach

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Background

Although the Daesh terrorist group has been severely defeated in Iraq and Syria, its affiliates have made inroads in Southeast Asia where over 60 groups¹ have pledged their loyalty to Daesh leader Abu Bakar al-Baghdadi and are planning to set up an “East Asia wilayat”. The region has seen a rise in the number of terrorist attacks that included a spate of suicide bombings in the Indonesian city of Surabaya in May 2018, and the five-month-long armed occupation of Marawi, a city in the southern Philippines in 2017². With the loss of Daesh territories in the Levant, some of the 1,000 battle-hardened and ideologically-committed Daesh foreign fighters who went to Iraq and Syria have returned along with militants of other nationalities, further raising the threat level for all countries in Southeast Asia. To address the continuing terrorist threat from Daesh and also Al Qaeda (AQ), which remains active and committed to global jihad, Singapore has adopted a raft of kinetic and non-kinetic measures, ranging from pre-emptive arrests and detention to protective security and counter-violent extremism (CVE) programmes. This article focuses on Singapore’s CVE

* This paper was submitted on 6 June 2018.

¹ Gunaratna, R. (2015). “The Rise of Islamic State: Terrorism’s New Face in Asia”. In: Wilhelm Hofmeister et al., ed., *From The Desert To World Cities*, 1st ed. Singapore: Konrad Adenauer Stiftung and S. Rajaratnam School of International Studies, pp.9-19.

² Mokhtar, F. (2018). *Looking Ahead to 2018: Even as IS weakens, evolving terror threat looms for S’pore*. [online] TODAYonline. Available at: <https://www.todayonline.com/singapore/looking-ahead-2018-even-isis-weakens-evolving-terror-threat-looms-spore>, accessed 24 September 2018.

approach and its emphasis on counter-ideology, community engagement and the active promotion of racial and religious harmony.

The Present Terror Threat Situation

According to the Ministry of Home Affairs (MHA)'s terrorism threat assessment report released in June 2017, the terror threat level in Singapore was at its highest level in recent years³. According to government figures, between 2007 and 2014, six restriction and five detention orders under the Internal Security Act were issued. But since 2015, seven restriction and 12 detention orders have been handed out. Last year, authorities apprehended the first woman believed to have been radicalised – a 22-year-old pre-school assistant who wanted to be a martyr's widow – as well as a 34-year-old managing director of a logistics firm who tried to join Daesh twice⁴.

The most recent case involved a 33-year-old engineer who was detained in August 2018 after he was radicalised by Daesh propaganda. According to security officials, he was attracted to the teachings of radical ideologues such as Anwar al-Awlaki and "grew to believe that the use of violence in the name of religion was justified"⁵. By late 2016, he was convinced he should fight and die as a martyr for Daesh in the terror group's self-proclaimed caliphate in the Middle East.

The radicalisation of such individuals and the circumstances that led to their support for Daesh and, in some cases, plans to travel to Syria, reveals three broad ways in which they were radicalised: social media posts and online material; radical preachers – online and over the radio; and "influencers" or radicalised persons who win over others to their point of view⁶.

³ Koutsoukis, J. (2018). *Terms of Service Violation*. [online] Bloomberg.com. Available at: <https://www.bloomberg.com/news/articles/2018-06-30/terrorism-threat-highest-since-9-11-singapore-minister-warns>, accessed 24 September 2018.

⁴ Mokhtar, F. (2018). *Looking Ahead to 2018: Even as IS weakens, evolving terror threat looms for S'pore*. [online] TODAYonline. Available at: <https://www.todayonline.com/singapore/looking-ahead-2018-even-isis-weakens-evolving-terror-threat-looms-spore>, accessed 24 September 2018.

⁵ Yuen-C, T. (2018). *Radicalised Singaporean engineer detained under Internal Security Act*. [online] *The Straits Times*. Available at: <https://www.straitstimes.com/politics/radicalised-singaporean-engineer-detained-under-internal-security-act>, accessed 24 September 2018.

⁶ Hussain, Z. (2018). *How 15 Singaporeans were radicalised by ISIS ideology*. [online] *The Straits Times*. Available at: <https://www.straitstimes.com/singapore/radicalised-in-singapore>, accessed 24 September 2018.

To prevent radicalisation and counter the spread of extremist ideas, Singapore has developed a wide range of policies and programmes that began in 2002 after the 9/11 terror attacks in the US by AQ and the discovery of a local branch of the regional terrorist organisation and AQ affiliate – the Jemaah Islamiyah (JI) – in Singapore in December 2001. JI operatives had planned to execute multiple bombing operations against Western targets in Singapore before they were apprehended. CVE initiatives were intensified as the terror threat persisted in and outside the region, especially after the establishment of Daesh in Iraq and Syria in 2014 and the aggressive exploitation of social media to disseminate more false and distorted Islamic doctrines.

Singapore's CVE Strategy

Singapore's CVE strategy involves strengthening social resilience to prevent racial and religious tension and conflict. This is necessary firstly because Singapore is one of the most religiously diverse country in the world.⁷ Its 5.6-million population comprises Buddhists (33.9%), Christians (18.1%), Muslims (14.3%), Taoists (11.3%), Hindus (5.2%) and others (0.7%); some 16.4% are categorised as atheists. The country is also ethnically diverse, comprising Chinese (74.3%), Malays (13.4%), Indians (9.0%) and Others (3.2%)⁸. Singapore has also experienced serious outbreaks of communal violence in the past viz. the Maria Hertogh riots in 1950 and the racial clashes in 1964 and 1969. Although there have been no similar communal outbreaks since, the potential for conflict in a multi-racial and multi-religious country is ever present. The growing religious fervour and assertiveness of religious groups since the 1980s have sometimes raised tensions between different religious communities.

Secondly, terrorist groups are known to have deliberately mounted terrorist attacks to provoke strong anti-Muslim backlash and heighten Islamophobia. This is evident from Daesh attacks in several European cities such as London, Paris, Brussels, Nice, Berlin and elsewhere. In the

⁷ "Global Religious Diversity". 2014. *Pew Research Center*. <http://www.pewforum.org/2014/04/04/global-religious-diversity/>.

⁸ Singapore in Figures 2018. (2018). [online] Singapore: Department of Statistics Singapore, p.6. Available at: <https://www.singstat.gov.sg/-/media/files/publications/reference/sif2018.pdf>, accessed 24 September 2018.

Berlin Christmas market attack in December 2016 for instance, the attack was purposely timed to coincide with Christmas festivities. The series of terrorist attacks in Western countries have led to a significant rise in hate crimes against Muslims as well as bolstered the electoral fortunes of right-wing and far-right political parties and politicians with strong anti-Islamist and anti-Muslim immigration agendas.

To prevent terrorists from sowing discord between Muslims and non-Muslims and undermining racial and religious harmony, Singapore has developed a comprehensive set of CVE measures involving counter-ideology, terrorist rehabilitation and re-integration, and community engagement. These measures are to ensure that in the event of a terrorist attack in Singapore, the different racial and religious communities would remain calm and united and not react emotionally and launch reprisals. As stated in a government White Paper issued in 2003: "Terrorism in the name of religion will cause enormous harm to inter-religious and inter-racial ties. Unlike material loss, such damage to Singapore's social fabric will take many years to heal."⁹

Counter Ideology

Countering terrorist ideology is a critical plank of Singapore's CVE strategy because of the systematic dissemination of erroneous, distorted and extremist teachings by terrorist ideologues and leaders. Terrorist propaganda claimed that it is obligatory for Muslims to wage armed *jihād* against Christians and Jews and migrate (*hijrah*) to theatres of conflict to establish or defend an Islamic state. They also claim that suicide attacks are permissible and that it is legitimate to excommunicate (*takfir*) and kill Muslims who do not share their beliefs and opposed them. Other false and misleading interpretations of Islamic texts and doctrines include the permissibility of killing civilians and non-combatants, torturing prisoners, forcing conversions, mutilating corpses and practising slavery.

Singapore has invested considerable efforts at exposing and refuting such distorted teachings and preventing them from taking root in Singapore. This is done at three levels – individuals arrested for

⁹ Ministry of Home Affairs (2003). *White Paper - The Jemaah Islamiyah Arrests and The Threat of Terrorism*. [online] Singapore: Ministry of Home Affairs, p.24. Available at: <https://www.mha.gov.sg/docs/default-source/others/english.pdf>, accessed 24 September 2018.

terrorism-related activities, their families and the community. At the forefront of these efforts are the Muslim scholars and community leaders working together with the government. A volunteer group of Muslim clerics came forward to form the Religious Rehabilitation Group (RRG) in 2002 to provide religious counselling to terrorist detainees and their families, offering expert advice on the correct interpretations of Islamic texts and practice, and dispelling the extremist doctrines they have been indoctrinated with. Together with psychologists and counsellors, the RRG has successfully rehabilitated many detainees who have been progressively released since the early 2000s¹⁰.

At the community level, the Singapore Islamic Religious Council or MUIS, a statutory board which administers matters relating to Muslims in Singapore, has taken several measures to inoculate the larger community from extremist ideologies. MUIS, together with the Singapore Islamic Scholars and Religious Teachers Association (Pergas), a well-respected and premier Muslim NGO, have developed a scheme called the Asatizah Recognition Scheme (ARS)¹¹ to ensure that religious teachers have the necessary qualifications and training and that the community has a credible source of reference to turn to. Launched in 2005, the registration of Muslim religious teachers under ARS was made mandatory in 2017. Religious teachers interviewed commented that the move “will ensure that religious teachings imparted will not divide society or lead to extremist ideologies”¹².

MUIS has also produced texts for Friday sermons that remind mosque congregations of the dangers of religious extremism and the importance of practising religious tolerance and moderation and ensuring peace and harmony in Singapore. These sermons also refute terrorists’ violent propaganda and misinterpretations and emphasize the importance of reading Islamic texts contextually.

MUIS outreach efforts include the Asatizah Youth Network (AYN) where religious teachers offer counselling and address queries on

¹⁰ Religious Rehabilitation Group. (2018). *RRG*. [online] Available at: <https://www.rrg.sg/about-rrg/>, accessed 24 September 2018.

¹¹ Muis.gov.sg. (2018). *Muis: Asatizah Recognition Scheme*. [online] Available at: <https://www.muis.gov.sg/ARS-and-IECP/About/About-ARS-IECP/More-info-on-ARS>, accessed 24 September 2018.

¹² MCI REACH. (2018). *Support to Expand Asatizah Recognition Scheme*. [online] Available at: <https://www.reach.gov.sg/participate/discussion-forum/2016/08/21/support-to-expand-asatizah-recognition-scheme>, accessed 24 September 2018.

terrorism-related issues.¹³ In a media statement issued in May 2018, MUIS announced that “Drop-in Sessions” are available at a designated mosque “to counsel and address queries about exclusivism and armed conflict”. It added that trained *asatizah* will enhance their online presence to offer support and guidance to youth on social media. MUIS is also promoting a Singaporean Muslim identity to build a Singapore Muslim Community of Excellence. It has identified “ten desired attributes focusing on knowledge, principle-centredness, progressiveness and inclusiveness”¹⁴.

In respect of outreach programmes, the RRG has also broadened its scope beyond counselling detainees and their families to build social resilience. It publishes counter-ideology materials and conduct public education programmes for Muslims and non-Muslims. It also runs a website that carries articles debunking extremist teachings, and a Resource and Counselling Centre for members of the public seeking clarifications on extremist ideology. Religious scholars working in the S. Rajaratnam School of International Studies (RSIS) also contribute to the community-wide counter-ideology effort by publishing articles countering terrorist propaganda that promote a violent agenda and an intolerant and destructive worldview. Articles promoting tolerance, religious moderation, inclusivity and pluralism are regularly published in the mass media. The scholars also engage the community through talks and school visits.

Related to the counter-ideology work for detainees and their families are the social re-integration efforts of the community to help former detainees reintegrate into mainstream society. This is an important component of the counter-terrorism effort to secure peace and stability in the longer term. A group of community organisations, also known as the Inter-Agency Aftercare Group (ACG), focuses on ensuring the socio-economic well-being of detainees and their families. It is a volunteer group set up in January 2002 by leaders from several community organisations, viz. Taman Bacaan (Singapore Malay Youth Library Association), Association of Muslim Professionals (AMP), Yayasan MENDAKI (Council for the development of the Malay/Muslim), Khadijah Mosque and En-Naeem Mosque. They

¹³ MUIS, “Media Statement on detention order announced by MHA under ISA,” <https://www.muis.gov.sg/Media/Media-Releases/11-May-18-Media-Statement--Detention-Order-Announced-by-MHA>, no. 4.

¹⁴ Muis.gov.sg. (2006). *Risalah for Building a Singapore Muslim Community of Excellence*. [online] Available at: <https://www.muis.gov.sg/-/media/Files/OOM/Resources/Risalah-eng-lr.pdf> p. viii, accessed 24 September 2018.

provide a range of family support services that include financial help and counselling.¹⁵ In addition to assigning a case worker to each family to help them obtain the relevant aid from existing social service programmes, efforts are also undertaken to help the families enhance their academic and vocational skills to improve their employment prospects. All these efforts are to ensure that the families remain functional and not vulnerable to the influence of extremist and deviant teachings. It is worth noting that the ACG also reaches out to non-Muslim organisations for support, and many have responded generously. For example, the Thye Hua Kwan Moral Society, a non-profit welfare group, provided trained counsellors to the detainees' families on a pro bono basis.

Community Engagement

Besides countering extremist ideology and implementing social reintegration efforts, another major initiative in the CVE effort is community engagement. Terrorists seek to sow discord between the different racial and religious communities by disseminating violent and divisive ideologies and perpetrating terrorist attacks. To preserve and strengthen communal harmony and ensure that Singapore's social fabric can withstand such challenges, the government embarked on a Community Engagement Programme (CEP) in 2006 to build up social resilience. This came in the wake of the London bombings in July 2005 which reinforced the threat of home-grown terrorism and the hate crimes against Muslims that followed¹⁶. (Three of the four terrorists involved in the bombings were second-generation immigrants who were born and bred in the UK.)

The CEP aims to "bring together Singaporeans from different communities, to strengthen inter-communal bonds, and to put in place response plans to help deal with potential communal tensions after an incident e.g. a terrorist attack"¹⁷. It aims to ensure that society remains strong and united

¹⁵ Teo Chee Hean, "Strengthening Social Resilience", in *Inter-Agency Aftercare Group*, 2016, p. 6.

¹⁶ Latif, A. (2011). *Hearts of Resilience: Singapore's Community Engagement Programme*. 1st ed. Singapore: Institute of Southeast Asian Studies, p. 2.

¹⁷ Kam, S. (2018). "Singapore's Approach to Counter Terrorism and Extremism". In: Beatrice Gorawantschy et al., ed., *Countering Daesh Extremism*, 1st ed. Singapore: Konrad Adenauer Stiftung and S. Rajaratnam School of International Studies, p. 148.

after a terrorist incident so that Singapore can recover quickly and people can continue with their daily lives in peace and harmony¹⁸.

The CEP involves five clusters comprising (a) religious groups and ethnic and welfare organisations, (b) educational institutions, (c) media and the arts, (d) businesses and trade unions, and (e) grassroots organisations. Various organisations in each of these clusters would “work among themselves and with those in other clusters to strengthen the networks and bonds within and between their respective communities”¹⁹.

Some components of these clusters were formed in the wake of the 9/11 and JI arrests. In 2002, the Inter-Racial Confidence Circle (IRCC) (later renamed Inter-Racial and Religious Confidence Circle) was formed in each of the country’s constituencies as a platform to promote inter-faith dialogue and confidence-building among the different communities. A National Steering Committee was also established to provide broad guidance for IRCCs to deepen inter-racial and inter-religious rapport within communities through activities such as heritage trails, interfaith talks and various other celebrations. The IRCCs are also trained to respond appropriately to racial and religious tensions during crises. They will also assist in the recovery process following a calamity, to help their communities and the nation return to a state of normalcy²⁰.

Besides the IRCCs, several other organisations are also involved in the promotion of inter-faith relations. The Inter-Religious Organisation (IRO), founded in 1949 to inculcate a spirit of friendship and cooperation among the leaders and followers of different religions²¹, conducts inter-faith prayers and blessings at both private and public events such as in times of national mourning. The IRO also organises exhibitions and seminars such as “Promoting Peace through Faith”. Each event is organised by members of a different faith group. It also publishes several books and pamphlets such as *Religions in Singapore* and *Religious Customs and Practices in*

¹⁸ Latif, A. (2011). *Hearts of Resilience: Singapore’s Community Engagement Programme*. 1st ed. Singapore: Institute of Southeast Asian Studies, pp. 22-23.

¹⁹ Latif, A. (2011). *Hearts of Resilience: Singapore’s Community Engagement Programme*. 1st ed. Singapore: Institute of Southeast Asian Studies, p. 24.

²⁰ Chua, G. (2009). *Singapore’s Approach to Counterterrorism – Combating Terrorism Center at West Point*. [online] Combating Terrorism Center at West Point. Available at: <https://ctc.usma.edu/singapores-approach-to-counterterrorism/>, accessed 24 September 2018.

²¹ *Inter-Faith* Vol. 1, No.1, March 2014, MCI (P) 163/10/2013, an official publication of the Inter-Religious Organisation, Singapore.

Singapore, and works with the government and private institutions on capacity-building efforts and other inter-religious-related issues.

The Harmony Centre is another initiative to promote greater understanding between religious communities. Established by MUIS at the An-Nahdhah mosque in 2006, the Harmony Centre encourages inter-faith dialogue and promotes greater understanding of Islam. It had received nearly 40,000 visitors between 2006 and 2013, including many foreigners²².

In 2007, Onepeople.sg was founded as a national body²³ for promoting greater inter-racial and inter-religious understanding in Singapore. It provides community engagement programmes that build capacity among educators, and community, religious and grassroots leaders, and members who have a significant influence on community relations. These programmes are tailored towards improving the understanding of issues, trends and developments concerning community integration, religious diversity, conflict resolution, ground-sensing and new media engagement to enhance ground efforts. It also trains and develops youth to ensure that the next generation takes ownership of the responsibility of maintaining Singapore's racial and religious harmony²⁴.

Another major initiative to strengthen Singapore's community response to counter the terror threat is the SGSecure²⁵ national movement. Launched in 2016, SGSecure aims to sensitise, train and mobilise Singapore's community to play a part to prevent and deal with a terrorist attack by being vigilant ("community vigilance"), staying united ("community cohesion") and staying strong ("community resilience"). Part of SGSecure's counter-terrorism effort is the establishment of the Harmony in Diversity Gallery (HDG) developed by the Ministry of Home Affairs in collaboration with community partners and organisations. The Gallery features common values and practices among religious groups. It "aims to promote an appreciation of Singapore's rich religious diversity" and "highlights the importance of seeking common ground to build mutual respect and

²² Mohamad Salleh, N. (2014). *Muis' Harmony Centre drawing interest from abroad*. [online] AsiaOne. Available at: <http://www.asiaone.com/singapore/muis-harmony-centre-drawing-interest-abroad>, accessed 24 September 2018.

²³ "About - Onepeople.Sg". 2007. *Onepeople.Sg*, <http://www.onepeople.sg/about/>.

²⁴ "About - Onepeople.Sg". 2007. *Onepeople.Sg*, <http://www.onepeople.sg/about/>.

²⁵ Sgsecure.sg. (n.d.). *SGSecure*. [online] Available at: <https://www.sgsecure.sg/>, accessed 24 September 2018.

appreciation for the beliefs of others, and the need to protect and expand our common spaces”²⁶.

Legal Instruments

In addition to counter-ideology and community engagement efforts to strengthen communal harmony, Singapore has relied on legislation to prevent disruptions to harmonious relations between the different races and religions. Well before the current religious-based terrorism emerged, Singapore already had in place a number of laws to prevent acts that could lead to racial and religious conflict. These include the Maintenance of Religious Harmony Act (MRHA), the Sedition Act, the Penal Code and the Undesirable Publications Act.

Enacted in 1990, the MRHA²⁷ provides for the maintenance of religious harmony and the establishment of a Presidential Council for Religious Harmony. The Act allows the government to, *inter alia*, issue a restraining order against any religious leader who commits or attempts to commit acts which cause “feelings of enmity, hatred, ill-will or hostility between different religious groups”. The person can be restrained from addressing orally or in writing any congregation or group of worshippers, or publishing any publication, or holding office in an editorial board of a religious group without prior government approval²⁸.

The MRHA was enacted after the issue of a White Paper²⁹ which details instances of religious activism and disputes during the 1980s that led to inter-religious tensions. These include complaints of aggressive and insensitive proselytization, disputes over the funeral of Muslim converts, intra-religious tensions among Hindu and Christian communities, mixing of religion and politics, and exploitation of religion for political ends. So far, no restraining orders have been issued but a number of religious leaders

²⁶ Harmonyindiversitygallery.sg. (n.d.). *Harmony in Diversity Gallery*. [online] Available at: <https://www.harmonyindiversitygallery.sg/>, accessed 24 September 2018.

²⁷ Sso.agc.gov.sg. (2018). *Maintenance of Religious Harmony Act - Singapore Statutes Online*. [online] Available at: <https://sso.agc.gov.sg/Act/MRHA1990#legis>, accessed 17 August 2018.

²⁸ Ibid.

²⁹ White Paper - Maintenance of Religious Harmony. (1989). [online] Singapore: Ministry of Home Affairs. Available at: <https://thir.st/wp-content/uploads/2018/04/MRHA-white-paper.pdf>, accessed 24 September 2018.

and activists have been called up and warned for denigrating other faiths or mixing religion and politics.

The Sedition Act provides for the prosecution of any person whose words or actions “promote feelings of ill-will and hostility between different races or classes of the population.”³⁰ Similarly, the Penal Code contains several sections which make it an offence to (a) wound the religious or racial feelings of any person; (b) promote enmity between different groups on grounds of religion or race; and (c) commit acts prejudicial to the maintenance of harmony between different religious or racial groups. Several offenders have been prosecuted and convicted for denigrating other religions in recent years

The Undesirable Publications Act³¹ aims to prevent the importation, distribution or reproduction of publications that *inter alia* “cause feelings of enmity, hatred, ill-will or hostility between different racial or religious groups”. In 2016, *Al Fatihin*, a Bahasa Indonesia language newspaper linked to Daesh, was gazetted as a prohibited publication under the Act. In 2017, the government banned nine publications which promote extremist and exclusivist views and denigrated other religions.

The Government has also relied on other legislation to bar foreign religious preachers from entering Singapore or from giving lectures if they are known to have expressed views that are divisive and promote disharmony between the religious communities. All the above-mentioned statutes have empowered the Government to take prompt and effective action against persons whose words or actions threaten to disrupt religious or racial harmony in Singapore.

Conclusion

Given the current terrorism landscape in Southeast Asia and continuing spread of terrorist propaganda online, efforts to counter terrorist ideology and strengthen community engagement will need to be stepped up. Vulnerable individuals continue to be misled by false and distorted interpretations of Islam on social media platforms. Rehabilitating such

³⁰ Sso.agc.gov.sg. (2018). *Sedition Act - Singapore Statutes Online*. [online] Available at: <https://sso.agc.gov.sg/Act/SA1948?Provides=legis#legis>, accessed 17 August 2018.

³¹ Sso.agc.gov.sg. (2018). *Undesirable Publications Act - Singapore Statutes Online*. [online] Available at: <https://sso.agc.gov.sg/Act/UPA1967>, accessed 17 August 2018.

self-radicalised individuals is also proving to be more challenging today compared to those arrested in the early 2000s. These self-radicalised individuals “have more complex social and psychological issues”.³² They absorb and hold on to what they see and read online due to their limited understanding of Islam. The radicalised individuals are also getting younger and therefore more vulnerable to manipulation.

On what more needs to be done, the Minister for Home Affairs has suggested the need to encourage greater integration among citizens, and also to get young people to listen to accredited preachers to further their understanding of Islam. In respect of the latter, an RRG Awareness Programme for Youth was launched in March 2018 to help youth understand the dangers of extremist thoughts and ideology³³. The RRG Vice-Chairman suggested that the approach to teaching Islam has to change – heads of families need to teach their children “the importance of practising Islam in the context we are living today”³⁴. Indeed, family members and relatives play an important role in providing guidance and in preventing their loved ones from being radicalised; they should also be on the lookout for vulnerable family members and refer them to the relevant authorities if they display signs of radicalisation. At the national level, the government and communities must persist in their collaborative efforts to strengthen inter-racial and inter-religious harmony and social resilience.

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³² *The Straits Times*, “Self-radicalised people harder to rehabilitate: Shanmugam,” 14 March 2018, <https://www.straitstimes.com/politics/self-radicalised-people-harder-to-rehabilitate-shanmugam>.

³³ *The Straits Times*, 14 March 2018, <https://www.straitstimes.com/politics/self-radicalised-people-harder-to-rehabilitate-shanmugam>.

³⁴ *Ibid.*