



**Comparative Analysis of Nigeria's Counterterrorism Strategy (NACTEST) in
Light of the United States, the Kingdom of Saudi Arabia, and Kenya's
Strategy**

Usamotu Basheer Olalere, Adeyeye Adebowale Idowu and Omodunbi Olumide
Olumuyiwa

Department of Political Science and International Relations, Osun State
University, Osogbo, Nigeria

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*Corresponding author

E-mail address:

basheer.usamotu@uniosun.edu.ng



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ABSTRACT

Terrorism presents a persistent security challenge to both developed and developing states. Since the September 11, 2001 attacks, countries such as the United States, Kenya, and Saudi Arabia have adopted comprehensive counterterrorism frameworks to address evolving threats. Nigeria introduced its National Counter-Terrorism Strategy (NACTEST) under President Goodluck Jonathan, structured around five pillars: forestall, secure, identify, prepare, and implement. This paper undertakes a comparative assessment of NACTEST and the counterterrorism approaches of the United States, Kenya, and Saudi Arabia, focusing on their achievements, strengths, and limitations. Relying on secondary data and content analysis, and guided by protracted social conflict theory, the study finds that although NACTEST is conceptually robust, its implementation effectiveness lags behind the models adopted in the comparator countries. The analysis highlights Saudi Arabia's deradicalization-centered approach as particularly relevant for Nigeria, given the socio-religious similarities with Nigeria's northern region. The paper recommends adapting elements of the Saudi model to strengthen NACTEST's preventive and rehabilitative capacities.

1. Introduction

Most people agree that the word "terrorism" tends to relate to a certain kind of violent behavior, even while it is also commonly used to describe people, organizations, and groups that engage in it on a regular basis. But as Sinai (2011) has pointed out, defining terrorism is the most important place to start when studying it. This does not imply that its definition is straightforward or widely accepted by academics and professional organizations whose duty it is to oppose or limit it. Many definitions have oversimplified it by ignoring a number of important factors, such as activities that do not involve violence but nevertheless promote and support terrorism by organizing support within the radical subculture, offering social welfare services, and even sustaining and supplying internet services for such groups. The question of whether terrorism is a tactic of warfare employed by sub-national groups against all citizens of a state, regardless of whether they are military or civilians, or whether it should only include attacks on "noncombatant" targets is another difficult aspect of defining terrorism.

Therefore, in the context of changing social and political situations, various individuals interpret terrorism as a social construct. The conceptualization process gets more difficult when one incorporates cultural, religious, and economic perspectives. When studying terrorism and the propagandist technique, it is conceivable to take a literal approach, viewing the phrase as a weapon that may be exploited. (Adeyeye & Akinrinde, 2021; Adeyeye, Adedire, & Babalola, 2023). Attacks against armed military objectives and fighters should be excluded from the concept of terrorism as they fall within the category of guerrilla warfare if it is restricted to attacks on noncombatant groups. The distinction between these two groups is that terrorist organizations seek to provoke a government's response to their activities, which take place off the battlefield, whereas guerrilla groups employ a combination of

military and political tactics to destroy a state's government.

Feyyaz (2005, p. 17) has described terrorism as "a form of violent struggle in which violence is deliberately used against civilian in order to achieve political goals (nationalistic, socioeconomic, ideological, religious etc.)" in favor of this difference. According to Feyyaz, what separates a terrorist attack from guerrilla warfare, where military targets are the primary focus of operations, is the use of "deliberate" targeting of civilians in order to accomplish political goals.

However, according to Karaffa (2015), there are three ways to look at terrorism. The first viewpoint is to consider it as an adversary to be vanquished in a conflict. This parallel is predicated on the application of military tactics to counter terrorism. The second is from the standpoint of standard police tactics and protocols. This parallel has two extremely significant implications: first, it implies that if terrorism is contained, it will vanish, just like crime; second, it implies a reactive reaction.

Criminals are frequently caught or apprehended, usually after the crime has been committed rather than before. Lastly, the third viewpoint views terrorism as a social ill that has to be cured. Scholarly disposition to this perspective sees terrorism from the prisms of symptoms and causes. The assumption of this approach is that there is need for the discovery and adoption of long-term plans that address the core causes of terrorism and thus its solution will develop from evaluating the symptoms and causes. These three viewpoints, while not exclusive, reflect the prevalent perspectives held by academics and professional organizations tasked with combating terrorism.

Therefore, in the modern international order, fighting terrorism has become a primary endeavor of concerned governments. To combat the threat of terrorism in their individual governments, both industrialized and developing nations have been

implementing permanent policies or plans. The United States has implemented a systematic policy to combat terrorism since the terrorist assault in 2001. Similar tactics are used by other nations that deal with terrorism worldwide to counter this threat. How effective is Nigeria's standing strategy? How much does Nigeria's counterterrorism approach differ from that of the United States, the Kingdom of Saudi Arabia, and the Republic of Kenya? What can Nigeria take out from these states? Answers to these questions are much needed. However, by analyzing and assessing Nigeria's counterterrorism strategy—known as NACTEST—and contrasting it with the three nations, this article aims to answer such issues. The study uses Protracted Social Conflicts (PSC) and a secondary technique of data collection.

2. Materials and Methods

This study gathers information from secondary sources and is mostly qualitative in nature. The information used in this study came from official government documents, policy papers, academic publications, textbooks, reputable newspapers and periodicals, and trustworthy online archives. Reputable academic, governmental, or intergovernmental sources that directly addressed the three primary themes of the study—counterterrorism, multilateralism, and national development—and were published between 2000 and 2024—a time marked by the global rise in terrorism and Nigeria's shifting counterterrorism policy posture—were accepted (NACTEST). Materials that lacked authorial legitimacy, were not peer-reviewed (aside from official policy publications), or contained opinion-based or unsupported information were excluded. The study's descriptive-comparative analytical technique allows Nigeria's counterterrorism efforts to be compared to those of the United States, Saudi Arabia, and Kenya. This paradigm facilitates the identification of patterns, similarities, and variations in Nigeria's diplomatic, military,

and financial dealings across time. Comparative considerations included institutional mandates, Nigeria's strategy commitments, agency involvement levels, and measurable developmental accomplishments.

Content analysis is the method of data analysis employed in the article. Content analysis was used to systematically classify and understand documentary material. To do this, a number of policy documents, security reports, Nigeria's foreign policy statements, and relevant case studies—including the deradicalization process, financial control, and Nigeria's efforts to engage, prevent, and stop terrorist and insurgent organizations—had to be coded. The coding process focused on recurring subjects like strategy and counterterrorism in order to extract similar patterns across sources. Documents without traceable, verifiable, or thematically relevant content were then removed. The method ensures reliability, transparency, and a logical analytical procedure suitable for qualitative research by adhering to these stages.

2.1 Framework Analysis

This study adopts **Protracted Social Conflict (PSC)** as its theoretical foundation. The concept, attributed to Edward Azar (1986, 1990, 1991) and cited by Agara and Ajisebiyawo (2017), explains how long-term, identity-based conflicts emerge and persist within states. According to Azar (1991), protracted conflicts arise when social groups are denied essential needs such as security, identity recognition, political participation, and equitable access to economic resources. PSC focuses on relationships among **intra-state identity groups**—ethnic, religious, or cultural communities—highlighting how the state's behaviour either alleviates or exacerbates group grievances (Agara & Ajisebiyawo, 2017).

Long-lasting disputes are caused by four interconnected factors, according to Azar.

First, communal content, which includes society's ethnic, religious, and cultural makeup. The second is Human Needs Deprivation, which describes how much a group lacks socioeconomic access, security, or involvement. Third, State Capacity and Governance This demonstrates the power, authority, and adaptability of governmental institutions. Fourth, International Linkages examines the impact of geopolitical ties, foreign alliances, and pressures. These factors are important for comprehending the reasons behind the persistence of terrorism in Saudi Arabia, Nigeria, Kenya, and the United States, as well as the reasons behind the success or failure of counterterrorism measures in these nations.

When assessed via the NACTEST evaluation system, PSC offers a useful lens for elucidating the efficacy of Nigeria's counterterrorism initiatives. According to PSC, confidence erodes when identity groups feel excluded or singled out by the government. This immediately impacts community-based intelligence, which is one of the most important factors in determining the effectiveness of counterterrorism. Intelligence sharing is restricted, which hinders the early discovery of terrorist cells in areas where ethnic or religious groups mistrust security authorities (such as the northeast of Nigeria or the Somali-majority parts of Kenya). On the other hand, community-security cooperation improves counterterrorism efficacy in countries with higher levels of inclusion and trust, such as the United States or Saudi Arabia.

According to PSC, unfulfilled needs foster extremism. Terrorist groups take advantage of people's political exclusion, insecurity, or poverty; in Nigeria and Kenya, deprivation aids in the recruitment of Boko Haram and al-Shabaab. When states address these grievances through social and economic policies, radicalization decreases, increasing the effectiveness of preventive counterterrorism measures.

PSC emphasizes how weak, disjointed, or illegitimate institutions contribute to the continuation of conflict. Coordination, legal processing, border security, and accountability are all difficult for states with limited institutional capability (such as Nigeria). Strong state capability improves operational efficacy, legal enforcement, and CT coordination (e.g., Saudi Arabia and the United States). Therefore, PSC contributes to the explanation of variance in NACTEST scores associated with institutional performance. International alliances either boost or weaken counterterrorism, as explained by Azar's fourth variable. Strong external CT collaborations are advantageous to Saudi Arabia and Kenya. Nigeria's collaboration, like the MNJTF, is less successful due to coordination issues. Therefore, PSC explains how international ties can strengthen or weaken national counterterrorism results.

PSC was created to explain identity conflicts at the community level, not the strategic actions of governments or security organizations, hence it has limits when directly applied to the examination of national counterterrorism tactics, despite its applicability. It provides no insight into the security-sector interests, elite decision-making, or bureaucratic politics that frequently influence CT policy. PSC underemphasizes the ideological and transnational aspects of terrorism, such as international jihadist networks that are not just motivated by domestic frustrations. The military and technological capabilities that are increasingly essential to contemporary counterterrorism—such as surveillance systems, drones, and cyber-intelligence—are not covered by PSC. Although PSC believes that deprivation is the primary cause of conflict, other kinds of extremism are ideological rather than grievance-based, particularly in prosperous cultures.

Due to these constraints, PSC is used in this study as a supplementary framework, especially for comprehending legitimacy,

community-state interactions, and the social context in which counterterrorism program's function. The institutional and operational aspects of counterterrorism efficacy are

captured by NACTEST, which is linked with its insights. Table 1 below explains connections between NACTEST elements and variables of PSC theory.

Table 1. Conceptual Table: Connecting NACTEST Counterterrorism Elements to PSC Variables

PSC Variable	Core Meaning	NACTEST Elements	The Reasons Behind CT's Success or Failure
Collective Content	Intergroup ties and identity structure	Participation of the Community and Information Collection	Participation of the Community and Information Collection
Deprivation of Human Needs	Lack of socioeconomic access, political involvement, and security	Deradicalization and Prevention	Unmet needs encourage radicalization, while resolving complaints lowers recruiting.
State Capacity & Governance	Institutional strength and legitimacy	Legal frameworks, coordination, and border security	Strong state capacity increases CT efficacy, but weak state capacity hinders implementation.

(Table 1, Source: produced by the author but information is generated from the body of paper).

3. Results and Discussion

3.1 The strategies of Nigeria and the United States

Nigeria's efforts to combat terrorism are outlined in the Nigeria Counterterrorism Strategy (NACTEST), a permanent policy document. Prevention, security, identification, planning, and implementation are the five pillars of NACTEST. These pillars are all intended to counter important aspects of terrorism (Usamotu & Agara, 2024). The first tactic, known as "forestall" (Section III:18-21), focuses on "creating and emphasizing security awareness among the populace, reducing the possibility and ability of terrorist groups to recruit new members and support, while introducing measures that will deter potential terrorists."

"To secure" is the strategy's second arm (Section IV:22-25). This stream is concerned with protecting infrastructure, utilities, and

citizens by lessening their susceptibility to assaults (Usamotu and Agara, 2024). "To identify" is the third pillar (Section V:26-29). The goal of this NACTEST branch is to "stop terrorist threats and attacks on Nigeria and her interests." The NACTEST document's fourth pillar (Section VI: 30-31) addresses the fourth stream of the government's counterterrorism strategy, which is to "prepare." Its goal is to "ensure that the nation is ready to manage and minimize the consequences of a terrorist attack where it cannot be stopped and increase resilience for an immediate recovery from the aftermath of an attack." "To implement," the last and fifth pillar, "involves the various elements acting together and cooperating to deal with a complex threat" (Section VII:32-37) (Usamotu & Agara, 2024).

The United States has two distinct strategies: counterterrorism and anti-terrorism. On the other hand, military defense is the foundation of counterterrorism. The goal of this military

strategy is to stop, neutralize, and lessen terrorist attacks (Abolurin, 2015). This is comparable to the previously described NACTEST pillars in Nigeria. Non-military methods are also part of the US anti-terrorism policy. Programs for de-radicalization are used to carry this out. Offensive military strategy is implied by counterterrorism. In contrast to the first approach, which blends the two techniques,

This is basically a military strategy. It entails going to the enemy's caves to wage combat. The National plan of Counter Terrorism (NSCT) is the name of the US plan. NSCT contains five pillars, much like NACTEST. These pillars are further divided into tactics for fighting the war against terror that are both short-term and long-term. The goals of the NSCT are as follows: "(i) advance effective democracy; (ii) prevent attacks by terrorist networks; (iii) deny terrorists the support and sanctuary of rogue states; (iv) deny terrorists control of any state they would use as a base and launching pad for terror" (Abolurin, (2015)).

Only the first pillar—introducing democracy in regimes rife with terrorists—is classified as long-term. According to NSCT, underdevelopment, human rights violations, and a lack of freedom are the root causes of terrorism. The NSCT believes that the only way to stop this threat is to create a system that would support freedom, human rights, and progress, even though those elements are also creations of the totalitarian political regimes in the Middle East and Asia. Given that Nigeria's terrorism developed in 2009 after the country had already reverted to democracy in 1999, we may argue that this presumption or tactic is irrelevant to Nigeria (John, 2019). The other four NSCT pillars are mostly focused on foreign adversaries. The US's domestic security could only be associated with the second pillar (George, 2002). Al Qaidah, Talban, Sadam Hussain, and other foreign terrorists are the focus of other pillars. Conversely, the NACTEST pillars were

primarily designed to combat terrorists who came from Nigeria. International terrorist networks receive little to no attention.

The US has just developed a new approach that is comparable to NSCT. The National Strategy for Countering Domestic Terrorism (NSCDT) is the name given to this. In March 2021, this document was created (Joseph, 2021). It is made to deal with domestic terrorism. In this instance, terrorists who harbor prejudices based on race, religion, or ethnicity are also targeted in addition to Islamists. Minorities and the impoverished in the United States are the targets of this act of terrorism. Muslims, Jews, and immigrants—particularly African Americans—are among them, but they are not the only ones (Mohsen, 2015). Violence against women or girls is another aspect of it. There are four pillars of NSCDT. This strategy's goals and pillars are comparable to those of NACTEST. There are, nonetheless, some disparities.

It is well known that NACTEST adequately captures the first two NSCDT pillars and aims, but not the latter two. The function of lawmaking and law adjudication in combating terrorism is discussed in NSCDT Pillar 3 Objective 2 (Joseph, 2021). Nigeria's approach does not account for this. NACTEST's lack of focus on long-term terrorist contributions is another point of divergence. By creating a distinct pillar for long-term contributing elements, NSCDT gives them the credit they deserve. Our conclusion is that, although there is certainly room for improvement, Nigeria's counterterrorism approach is mostly in line with US tactics.

Analysis of the Reasons for the Disparities Between Nigeria and the US

Nigeria and the US differ primarily in their historical paths, governmental capacities, institutional development, and sociopolitical contexts. The United States has had centuries to establish a professional bureaucracy, strengthen its democratic institutions, and

create reliable, well-funded security services. Strong supervision procedures, a culture of responsibility, and a long history of the rule of law foster an atmosphere where laws are applied more uniformly and are less susceptible to political meddling.

Nigeria's post-colonial setting, on the other hand, has resulted in weaker institutions and dispersed security systems due to military interventions, ethnic rivalry, and unequal state-building. Coordination of policy and intelligence sharing is hampered by a lack of resources, political favoritism, and disparities in agency capability. Nigeria also has to deal with more complicated internal security issues, including as armed organizations, insurgencies, intercommunal disputes, and pervasive socioeconomic grievances, which frequently push security agencies to their limits. The United States' security and counterterrorism infrastructure is more coherent, stable, and successful than Nigeria's, which still struggles with implementation gaps, coordination issues, and resource limitations. These structural, political, and historical considerations explain why.

The Nigeria-United States Comparison: Lessons for Nigeria

Effective national security and development results are shaped by strong institutional frameworks, evidence-based policies, and strong accountability systems, as demonstrated by the comparison between Nigeria and the United States. The U.S. approach shows how a clear line of command, sophisticated intelligence technologies, and integrated interagency collaboration improve counterterrorism efficacy. Furthermore, the United States' emphasis on civic-military connections, community policing, and respect for civil rights demonstrates how openness and public confidence may bolster security strategy. Nigeria may also learn from the United States' long-term strategic planning, sufficient funding for security organizations, and ongoing staff professionalization and

training. Overall, the comparison indicates that greater institutional capability, better supervision, better integration of information, and policies based on long-term national strategy and research would be beneficial for Nigeria's security and governance systems.

3.2 The strategies of Saudi Arabia and Nigeria

Like Nigeria, the Kingdom of Saudi Arabia has a counterterrorism policy that emphasizes both military and non-military tactics. However, Saudi Arabia's approach is built on three pillars: the actors, the financiers, and the attitude, in contrast to Nigeria's five pillars (Sumanto & Shafi, 2020). The terrorists are referred to as "the actors," the first pillar. These individuals engage in acts of terrorism or extremism. To better prevent terrorist acts, manage threats to national security, and eradicate the physical presence of extremist and terrorist formations in the Kingdom, Saudi Arabia's Ministry of Interior has continuously reorganized operations, plans, tactics, and coordination (Vision of Humanity, 2024). Military and paramilitary groups who are anticipated to take part in the fight against terrorism frequently get a series of training exercises.

To accomplish this purpose, regular involvement in international counterterrorism measures was undertaken, including cooperation with the United States (US) and the United Kingdom (UK). They collaborate with Saudi security specialists to foil terrorist schemes, expose terrorist activities, and track down the sources of funding for terrorist groups. Although not as frequently as Saudi Arabia, Nigeria collaborates with the US and the UK. For example, the Nigerian government collaborated with the US towards the end of the 1990s, increasing its military engagement. Additionally, the US administration, led by Bill Clinton, created the Africa Crisis Response cooperation in 1997 as

part of the Nigeria-US counterterrorism cooperation. During the August 2014 US-Africa Leaders' Summit, the United States announced Nigeria's involvement in the Security Governance Initiative (SGI).

As a participant in the US government's Trans-Sahara Counterterrorism Partnership (TSCP), Nigeria has also contributed to the development of law enforcement and security sector capability, strengthening finance control, enhancing regional and state borders and customs systems, and promoting security sector capacity in combating violent fundamentalism and radicalism. (Adeyeye, Akinrinde, & Omodunbi, 2022; Adeyeye, 2017). Despite all of this, Saudi Arabia has not had another terrorist assault since the 2003 Riyadh terrorist strikes, but Nigeria has seen several terrorist attacks (Mahboob, 2017). The individuals who provide financial resources and donations to terrorists are referred to as "the Financers," the second pillar. Donors to terrorists are the focus of this pillar. These might be people, organizations, or groups that are located both inside and outside the Kingdom. By working with both domestic and foreign organizations, the Kingdom was able to accomplish this (Daniel, 2016). The Kingdom of Saudi Arabia, for example, collaborated with "the Financial Action Task Force (FATF), Egmont Group of Financial Intelligence Units, and Middle East and North Africa Financial Action Task Force" (Al-Othaimin, 2017).

Additionally, the Kingdom changed its financial policies. In 2005, for instance, it created the Saudi Arabia Financial Crime Unit (SAFCU), which subsequently changed its name to the Financial Intelligent Unit. Money laundering and financial dealings with terrorist organizations both inside and outside the Kingdom are under the purview of this section (Realuyo, 2015). In a similar vein, all financial institutions were instructed to adhere to FATF regulations by the Saudi Arabia Money Agency, which is now known as the Saudi Arabia Monetary Authority (SAMA).

Saudi Arabia was classified among the top ten members for adhering to and implementing the FATF 40 guidelines as a result of this strict adherence (Qurtuby and Aldamer, 2021). However, Nigeria's commitment to implementing FATF recommendations was so poor that it was sanctioned for a while before being restored (Richard, 2024 and Wisdom, 2024). This lack of dedication may lead us to conclude that, in comparison to international norms, Nigeria's counterterrorism policy is still inadequate. Furthermore, Saudi Arabia's financial plan includes directing all banks to cease sending or transferring funds to any banks outside the Kingdom, particularly those that are thought to be associated with terrorism. Additionally, it worked with the United States and the United Kingdom to shut down Saudi Arabian charities that could be financing terrorism either directly or indirectly. "The International Islamic Relief Organization, Al-Haramain Foundation, and Saad Al-Faqih" are a few of the organizations that were prohibited (Ansary, 2008).

Additionally, Nigeria has banned a number of foreign groups that are thought to have ties to terrorism. For instance, Haaramain was outlawed in Nigeria. However, Nigeria's multi-religious environment and sensitivity make it challenging to exclude certain other Islamic foundations, unlike Saudi Arabia (Tabia, 2017). As a Christian and a Southerner, President Jonathan found it challenging to do this. Even President Buhari, a Muslim from the North, has his limitations. This is due to differing opinions about how to deal with terrorists: some Muslim clerics anticipate that Nigeria would deal harshly with Boko Haram, while others anticipate that the government will treat them like Niger Delta insurgents (Tunde, Usamotu & Young, 2022). Due to the state's high degree of homogeneity, this is not the case in Saudi Arabia (Javed, Muhammad, and Abureza, 2022). The attitude is the third pillar of Saudi Arabia's counterterrorism policy (Sumanto & Shafi, 2020). The terrorists' ideology—their

religious interpretation and comprehension that drew them to radicalism, extremism, and terrorism—is implied by their mindset. Similar to Nigeria, the Kingdom seeks to thwart terrorists' attempts to radicalize individuals, particularly young people. Additionally, it seeks to instill moderate Islamic philosophy in people's brains and intellectually fight terrorists (Ansary, 2008). Prevention, Rehabilitation, and After Care (PRAC) are the three methods or elements that make up the strategy.

First, "prevention" refers to keeping young people from becoming radicalized, particularly young men. Several public awareness initiatives, such as religious education, public awareness campaigns, and international interreligious dialogue, are planned in order to accomplish this aim (Sumanto & Shafi, 2020). Additionally, it entails updating textbooks, reviewing the curriculum, and introducing Islamic moderate philosophy (Al Wasatiyyat) (Ansary, 2008).

These signals are sent to people in a number of ways. The internet, satellite services like Al Arabiya, television, radio, social media, billboards, campuses, schools, mosques, and sports facilities are all utilized by the authorities (Ansary, 2008). This obligation falls on six ministries. They include the "Ministries of Islamic Affairs, Endowment, Da'wah, and Guidance; Education; Higher Education; Culture and Information; Labor; and Social Affairs" (Boucek, 2008a).

This demonstrates the degree of dedication Saudi Arabia has to fighting terrorism, something Nigeria does not exhibit. Deradicalization and rehabilitation procedures in Nigeria are managed by the Office of National Security Adviser (ONSA) and the Ministry of Interior, namely the Nigeria Prison Service (Atta & Shane, 2026).

The second is "rehabilitation," which entails persuading terrorists, their affiliations,

supporters, and admirers to stop their horrible deeds; and third, "to reintegrate," which refers to reintegrating a suspected terrorist back into society once they have received the necessary treatment while in detention (Sumanto & Shafi, 2020). Similar to Nigeria, the program is run by the Ministry of Interior and primarily targets either actual terrorists who have served their prison terms or suspected radicals and supporters who have not carried out any terrorist attacks. They are involved in critical discussions on religion and psychology. Scholars (Islamic scholars, Western-oriented social scientists, psychologists, physicians, psychiatrists, and statisticians) are hired to debate the terrorists and teach them the correct interpretation of the Quran and Hadith, which promotes conciliation, tolerance, and communication rather than violence and terrorism (Ansary, 2008). Only 35 persons have been arrested again, yielding a 2% recidivism rate, according to Boucek (2008a & b). This demonstrates the effectiveness of Saudi Arabia's rehabilitation programs. Similar rehabilitation programs are in place in Nigeria. According to reports, none of the graduates of this type of rehabilitation were detained again for a crime between 2018 and 2022 after being released back into society in 2018 (BBC, 2018).

However, several of them were detained in 2023 for offenses other than terrorism, including as drug trafficking, theft, rape, and other serious crimes (Abiodun, 2023; Daily Trust, 2023 and Umar, 2023). Therefore, it is not possible to draw the conclusion that Nigeria's rehabilitation program is on par with or superior than Saudi Arabia's. Instead, Nigeria may not have the logistical capacity to adequately supervise these individuals upon their release (Adetayo & Ayodeji, 2023).

Third, "After Care" refers to actions conducted by the Saudi government on terrorist inmates following their completion of the rehabilitation program. Saudi Arabia uses the stage to stop rehabilitated militants

from returning to their horrible crimes after being freed. This approach is based on Saudi Arabia's current practice or culture toward the rehabilitation of inmates (Boucek, 2008b). The After Care approach involves many ministries as well as governmental and non-governmental groups. The Committee for Supporting Prisoners and their Families, Islamic affairs, social affairs, labor, and health are only a few of these ministries and organizations (Boucek, 2008b). Third, "After Care" refers to actions conducted by the Saudi government on terrorist inmates following their completion of the rehabilitation program. Saudi Arabia uses the stage to stop rehabilitated militants from returning to their horrible crimes after being freed. This approach is based on Saudi Arabia's current practice or culture toward the rehabilitation of inmates (Boucek, 2008b). The After Care approach involves many ministries as well as governmental and non-governmental groups. The Committee for Supporting Prisoners and their Families, Islamic affairs, social affairs, labor, and health are only a few of these ministries and organizations (Boucek, 2008b). It is neither in principle nor in real life, and this is related to the fact that the Nigerian government shows little to no concern for regular Nigerians, much less those who have served time in prison.

In contrast to Nigeria, the Kingdom has a facility that serves as a bridge between the jail and the prisoner's family home prior to ultimate release (Boucek, 2008b). The Care Rehabilitation Center (CRC) is the organization that carries out this task.

The third technique, After Care, is used to run this facility. It should be mentioned that prior to the threat of terrorism, Saudi Arabia had a custom of releasing inmates into society after serving their sentences (Boucek, 2008a). However, they must go through a process of reintegrating into society. Saudi Arabia just applies this standard procedure to terrorists who have been rehabilitated before returning them back into society.

The CRC is a dormitory building, not a jail, even if it is still gated. It features an open sky, sports facilities, and grass. Instead, then wearing uniforms, security personnel dress like everyone else. In addition to interacting with inmates as brothers, officers play sports like football and volleyball with them (Boucek, 2008b). Since some extremists believe that sports are prohibited in Islam, art therapy through sports activities is seen as crucial as part of the rehabilitation and reintegration process. Consequently, it is highly relevant to evaluate the degree of deradicalization of inmates based on their participation in sports (Boucek, 2008b and Ansary, 2008).

Additionally, family members are permitted to visit detainees at CRC, and detainees are free to make and receive phone calls whenever they like (Ansary, 2008). This privilege is meant to help inmates get ready for life outside prison. Additionally, it is found that detainees are sometimes removed from the CRC to travel with Center personnel. The inmates are really briefly freed at the end of this procedure so they can spend time with their relatives (Boucek, 2008b). The detainee's guarantors sign the appropriate paperwork attesting to his return to the facility at the designated time. All of this is done to evaluate a prisoner's sincerity of rehabilitation and to expose him to life after jail. The precise date of their ultimate release would eventually be disclosed to the captives (Boucek, 2008a). The government purposefully delays some inmates past the deadline as part of the plan. Officers often encourage detainees to file a lawsuit against the government for detaining them for longer than necessary. Boucek (2008b) claims that the government has been sued over 32 times. Additionally, the government has purposefully given a week-long defense each of the 32 times it has been sued. simply to convey to the prisoners that, instead of resorting to violence and terrorism, they may successfully pursue their complaints against the government through the legal system

(Ansary, 2008). According to records, the Ministry of Interior paid each individual's entitlements at a rate of 1,000 SAR each day (about \$267) circa 2007 (Boucek, 2008b).

The conclusion is that, in certain aspects, such as physical fighting and soft strategy, Nigeria's counterterrorism strategy is comparable to Saudi Arabia's. However, Nigeria's dedication to combating terrorism is not as strong as Saudi Arabia's. While saboteurs are impeding Nigeria's government's attempts to fight terrorism, everyone in Saudi Arabia is working together because they all believe that fighting the threat is their duty (Ansary, 2008). With the exception of the aforementioned differences, the majority of Nigeria's strategies are similar to those of Saudi Arabia. Therefore, we can conclude that Nigeria is in line with global practices, provided that those shortcomings are addressed and that Nigeria adopts a people-centered strategy that makes use of both non-governmental and whole-of-governmental approaches.

Analysis of the Reasons for Nigeria and Saudi Arabia's Disparities

Nigeria and Saudi Arabia differ in their political systems, historical development, approaches to resource control, and interactions between the state and society. A tiny, cohesive governing class has the majority of the decision-making power in Saudi Arabia's highly centralized monarchical government.

This concentration lessens bureaucratic fragmentation and enables quick, consistent policy implementation. Nigeria's federal democratic system, in contrast, divides authority across several tiers of government, making coordination difficult and increasing the variance in how policies are carried out.

Saudi Arabia's rentier-state model, which is based on significant and steady oil earnings, has made it possible to consistently spend in

security institutions, cutting-edge intelligence capabilities, and extensive deradicalization initiatives. Even though Nigeria has abundant natural resources, long-term planning and steady funding for security changes are more challenging due to the country's more erratic revenue flows and institutional leakages. Additionally, the internal security environment in Saudi Arabia is somewhat simpler. Because there are fewer large-scale armed organizations and less socioeconomic instability, the state can focus its resources on counter-extremism and ideological programs. Nigeria, on the other hand, has a variety of security risks stemming from historical marginalization, poverty, and ethnic diversity, including as insurgency, banditry, community disputes, and separatist movements. These demands put pressure on state institutions and make it more difficult to implement centralized strategies like Saudi Arabia's. Overall, the disparate policy results between Saudi Arabia and Nigeria are shaped by structural and contextual variations in political organization, economic management, and security situations.

Lessons for Nigeria from the Comparison between Saudi Arabia and Nigeria

Nigeria can learn a lot from Saudi Arabia's centralized policy coordination, long-term national planning, and methodical application of security and counterterrorism frameworks, according to the comparison between the two countries. Strong institutional coherence, consistent investment in intelligence capabilities, and the integration of deradicalization and rehabilitation initiatives like the Mohammed bin Nayef Center are the foundations of Saudi Arabia's effectiveness in countering extremist threats. Additionally, Saudi Arabia's deliberate use of oil profits to promote economic diversification serves as an example of how resource-rich nations may bolster state stability through revenue management, stringent accountability procedures, and focused development

planning. Overall, by strengthening institutional coordination, enhancing policy continuity, and implementing a more proactive approach to resource management and counter-extremism programming, Nigeria may improve both its security and governance outcomes.

3.3 The strategies of Kenya and Nigeria

As-Shabaab, one of the biggest terrorist organizations in the world today, is posing a threat to the Republic of Kenya (Philip, 2017). Al-Qaida and As-Shabab are believed to have close ties (Daniel, 2013). The organization is intelligent and well-connected. Its origins are in Kenya and Somalia. Kenya believes that its main duty is to fight terrorism in the Horn of Africa (HOA) (Mutinda, 2023). This is one of the factors making Kenya susceptible to regional terrorist strikes. Its ties to Israel and the West are among the other considerations (Byman, 2008). The National Strategy to Counter Violent Extremism (NSCVE) is being used to carry out these actions (Republic of Kenya, 2017). Kenya's counterterrorism operation is called Operation Linda Nchi, similar to Nigeria's Operation Lafia Dole. Kenya swiftly supported UN Security Council Resolution 1373, which called for worldwide counterterrorism cooperation, in response to the 1998 Al Qaeda assaults on US embassies in Nairobi and Tanzania, as well as ongoing attacks in the nation and the US experience of 9/11. Kenya's military operation therefore began in 2001. The terrorists were vanquished and Somalia was restored by the Kenya Defense Force (KDF) AMISOM (Freedom House, 2018).

Kenya and Nigeria have quite distinct demographics. Since then, Kenya has a minority of Muslims, whereas Nigeria has a majority of Muslims (The World Factbook, 2022). Kenya's counterterrorism policy may be more effective than Nigeria's because of this distinction. Second, Kenya's military operations were mostly directed against foreign terrorists, such as As-Shabab in

Somalia, but Nigeria's military actions were primarily directed against Nigerian terrorists (Mutinda, 2023). As a result, a few terrorists in Kenya were apprehended. Kenyan counties have implemented certain Action Plans (AP) to prevent and combat violent extremism, in line with the central government's commitment to combating terrorism. Each of Kenya's 47 counties has a document known as a County Action Plan (CAP). Each CAP is designed to support local NSCVE projects at the national level and is made up of pillars intended to address concerns specific to the area. Politics, security, religion and ideology, the arts and culture, and access to justice are among the topics they cover (Usama, 2020). This is comparable to Nigeria's counterterrorism strategy, which likewise involves governments, ministries, and agencies.

But from 2011 to 2015, Kenya's approach was mostly military. However, the introduction of the soft approach in 2016 prompted the implementation of socioeconomic initiatives aimed at addressing the causes of radicalization. Marginalization, poverty, unemployment, and other problems are some of these factors (Republic of Kenya, 2017). Nigeria created jobs for certain young people in disaster areas, much like Kenya did. It also started developmental initiatives and programs in the communities and offered capacity building (Pulse News, 2020). Kenya has also started reviewing the madrasa curriculum. The government observed that some Arabic schools' curricula might act as catalysts for young people to become radicalized. Sensitive subjects that can incite violence were eliminated when the curriculum was examined (Mutinda, 2023). Additionally, administrators and instructors at public schools embraced the avoidance tactic. Avoiding contentious topics that can radicalize young Muslims and lead to groupings or agitations is known as an avoidance technique (Daniel, 2013). Adopting an interfaith-based strategy to

combat religious extremist ideology is closely connected to the aforementioned. Similar to Nigeria, the Kenyan government used Christian and Islamic faith-based groups to prevent and fight terrorism and extremism in Kenya (Maj & Kristin, 2009). Interfaith discussions were frequently arranged by the central government, counties, and Dialogue Reference Group (DRG). According to the International Religious Freedom Report (2021), the majority of these conferences were held with the goal of fostering greater cooperation amongst individuals, regardless of their religious beliefs, on important issues affecting local communities.

Additionally, Kenya created the Anti-Terrorism Police Unit (ATPU) to specifically deal with any offenses linked to terrorism (World News, 2022). Investigating, disrupting, deterring, and enhancing security surveillance on criminal organizations is the unit's mission. Nigeria has created a special police unit to combat terrorism, therefore Kenya's approach is comparable to Nigeria's. The Nigerian Police Force (2022) refers to this as the Anti-Terrorism Squad (ATS).

Under the direction of a police commissioner, the ATS is responsible for conducting specialized operations, investigating, and preventing terrorist actions by individuals, organizations, and companies (Nigerian Police Force, 2022). We might contend that Kenya's ATPU is more effective at fighting terrorism than Nigeria's ATS given the severity and frequency of terrorist attacks in the two nations. We are concerned in assessing Nigeria's performance in the context of international practices, even though there may be other variables contributing to ATS inefficiency. Furthermore, despite having the structures needed to fight terrorism, Nigeria has demonstrated a lack of commitment.

Additionally, the Republic of Kenya passed the Anti-Money Laundering Act (AMLA) and the Prevention of Terrorism Act (PTA) in an

attempt to limit terrorist networks (The Republic of Kenya, 2012). These laws helped Kenya criminalize terrorism and prevented the international world from accusing the government of violating human rights. Nonetheless, claims of human rights abuses continue to come from many sources. For example, the Muslim community has accused the government of unfairly singling them out in the battle against terrorism (Norman and Bulelwa, 2019). Human Rights Watch also accused the Kenyan government of human rights violations. Human Rights Watch claims that "Kenyan's human rights have been violated as a result of the country's anti-terrorism laws, which permit extrajudicial murders, the disappearance of suspects, and physical torture while detained" (Human Rights Watch 2014). Several measures in Kenya have been abandoned as a result of these accusations. For example, Kenya's 2003 Suppression of Terrorism Bill, another in 2006, and the Minister of Justice's 2012 Prevention of Terrorism Bill were all dropped (Mutuma R. and Patrick M. (2018)). In 2016, a soft strategy was adopted as a result of these critiques. Human rights are now more important to Kenya's government than ever (Freedom House, 2018). Although Kenya is increasingly aware of human rights, it has been found that this awareness has slowed down Kenya's attempts to combat terrorism because the majority of terrorists are taking advantage of this opportunity to carry out their terrorist attacks.

Based on the aforementioned study, one may claim that neither Nigeria nor Kenya do much to protect human rights while fighting terrorism. Nonetheless, it is discovered that Kenya protects human rights more effectively than Nigeria. Kenya is listed as having "Medium Human Development" and Nigeria as having "Low Human Development" on the Human Development Index list of African nations (UN, 2020). With the passage of the 2011 Proceeds of Crime and Anti-Money Laundering Act, the 2012 Prevention of Organized Crime Act, and the Kenya

Prevention of Terrorism Act 2012, Kenya has also been more aggressive than Nigeria in combating terrorism and insurgency. Together, these regulations offer a robust legal framework for prosecuting terrorist crimes, in contrast to Nigeria. The Security Laws (Amendment) Act of 2014 was signed into law by President Jomo Kenyatta in 2014 (Adeyeye, 2017). This indicates that Kenya is more adept than Nigeria in guaranteeing human growth.

Analysis of the Reasons for Nigeria and Kenya's Disparities

Nigeria and Kenya have different political histories, administrative systems, and security settings, all of which contribute to their disparities. With comparatively stronger bureaucratic traditions and a political culture that has progressively formalized national security coordination, Kenya has seen a more centralized state-building trajectory. In contrast, Nigeria came from a more volatile post-colonial road characterized by significant ethno-regional divisions, protracted military control, and a federal structure that divides power among several levels of government. Maintaining policy continuity and coordinating security initiatives are ongoing issues brought on by this fragmentation.

External challenges, especially the spillover from Somalia and Al-Shabaab, have changed Kenya's counterterrorism environment and forced the government to make significant investments in border security, community-based intelligence, and interagency cooperation. Boko Haram, banditry, community violence, and separatist conflicts are all part of Nigeria's more complicated and deeply ingrained security complex. These simultaneous crises put a strain on institutional capacity and make it more difficult to build cohesive, efficient solutions like those in Kenya.

Kenya's economy is more service-oriented and diverse, which has helped to gradually improve public sector efficiency, digital governance, and law enforcement. Nigeria is unable to consistently engage in institutional development and security modernization due to its substantial reliance on oil income and periodic economic turbulence. In general, the two states' disparate policy results, degrees of institutional coherence, and efficacy in handling security challenges may be explained by their historical, structural, and economic contrasts.

Lessons for Nigeria from the Nigeria-Kenya Comparison

Nigeria may gain from Kenya's deeper integration of community-based intelligence, more consistent use of national security frameworks, and somewhat more cohesive counterterrorism cooperation, according to a comparison of the two countries. Kenya's experience highlights the importance of improved communication between federal and regional players, early warning systems based on grassroots engagement, and simplified interagency cooperation. Kenya's advancements in public-service reforms and digital governance also demonstrate how focused institutional restructuring may improve state capability. Overall, the comparison between Nigeria and Kenya indicates that by strengthening policy coherence, increasing community involvement, and using more flexible governance techniques, Nigeria might improve the efficacy of its security and economic strategies. The table below (Table 2) provides main findings' summary.

4. Conclusion and Recommendations

Although the term "terrorism" typically refers to violent acts, its definition is not always clear-cut. Many definitions oversimplify it, ignoring important factors like internet access and social welfare systems that encourage terrorism.

Table 2. Summary of Main Findings

Comparison	Similarities	Differences
Nigeria vs the United States	Both use frameworks for multi-pillar counterterrorism. Both employ both military and non-military strategies. Both are in line with international counterterrorism guidelines.	While U.S. plans target both local and foreign concerns, Nigeria's NACTEST primarily concentrates on domestic issues. Long-term structural changes, such as bolstering democracy and tackling the causes of extremism, are part of U.S. initiatives, but they are scarce in Nigeria. The legal system, accountability systems, and institutions of the United States are more robust than those in Nigeria. Nigeria underaddresses socioeconomic and ideological factors, whereas U.S. policies specifically address them.
Saudi Arabia vs Nigeria	Both employ soft and military counterterrorism tactics. Both emphasize rehabilitation and the avoidance of radicalization.	Saudi Arabia employs three of the five pillars of Nigeria's NACTEST (actors, finance, and ideology). Nigeria suffers from a lack of resources and religious sensitivity, whereas Saudi Arabia closely controls and prevents terrorist financing. Nigeria's rehabilitation program lacks aftercare, while Saudi Arabia's PRAC program offers systematic reintegration. Nigeria struggles with coordination, but Saudi Arabia has great social commitment and political coherence. While Nigeria still has frequent instances, Saudi Arabia has minimal recidivism and no significant attacks since 2003.
Nigeria vs Kenya	Both use soft-power and military counterterrorism strategies. Both deal with socioeconomic issues and radicalism. Both involve religious actors and communities.	Nigeria has internal dangers like Boko Haram and ISWAP, whilst Kenya mostly faces foreign threats like Al-Shabaab. Nigeria's coordination is less effective than Kenya's use of County Action Plans (CAPs) for targeted initiatives. Nigeria's involvement is less formal than Kenya's, which evaluates madrasa curricula and encourages organized interfaith discussion. Kenya's ATPU outperforms Nigeria's ATS in terms of efficiency and professionalism. Kenya's legal system is more robust than Nigeria's, which has difficulties with enforcement. Nigeria's poorer development makes implementation more difficult, while Kenya's medium HDI supports CT initiatives.

(Table 2, Source: produced by the author but information is generated from the body of paper).

Determining if terrorism includes assaults on noncombatant targets, whether it is a warfare technique against civilians or armed military, or whether it is limited to attacks on armed military personnel is another aspect of some definitions. Similarly, terrorism is described here as a type of violent conflict in which violence is purposefully employed against people in order to further political objectives. This essay makes it apparent that guerrilla warfare, which combines military and political tactics, is not the same as terrorism. As a result, this essay approaches terrorism from three angles: as an adversary to be vanquished in combat, as a societal ill that has to be treated, or as a sickness that calls for long-term solutions to deal with its underlying causes. This is due to the fact that these viewpoints reflect the prevailing attitudes of academics and professional organizations tasked with combating terrorism.

The fight against terrorism is a global endeavor in which both industrialized and developing nations have adopted methods. This essay compares Nigeria's NACTEST counterterrorism approach to those of the United States, Saudi Arabia, and Kenya. They are shown to be more closely associated in terms of military reaction when it comes to US counterterrorism policy. But the two nations are battling distinct groups of terrorists. While the United States is battling international terrorists, Nigeria is dealing with both domestic and foreign terrorists, the majority of whom are Nigerian citizens. Both NSCT and NACTEST employ both military and non-military strategies. In a similar vein, NACTEST offers little to no assistance in the fight against foreign terrorists. In general, the results show that Nigeria's counterterrorism policy resembles U.S. frameworks in many ways, but it lacks interagency coordination and legal coherence.

Nigeria's counterterrorism strategy usually complies with international standards, but it lacks Saudi Arabia's societal commitment, institutional strength, and post-rehabilitation

support. Lessons from Saudi Arabia underscore the importance of an all-encompassing, people-centered, and fully institutionalized counterterrorism policy that includes military, financial, ideological, and rehabilitative measures. Kenya has a more coordinated, proactive, legally backed, and locally integrated counterterrorism approach than Nigeria. Nigeria's goals and institutions are similar, but inadequacies in human development, coordination, legal enforcement, and practical competence restrict their effectiveness.

As a result, the paper recommends researching the Saudi Arabian counterterrorism approach, which includes a strong deradicalization effort. Given the similarities between Saudi Arabia and the northern region of Nigeria, where terrorist attacks are occurring, it is pertinent to examine Saudi Arabia's model. It equally recommends further institutional strengthening, better legal integration, improved long-term preventive planning, and more cogent inter-agency coordination to achieve comparable levels of effectiveness in Nigeria's counterterrorism. It is also imperative for Nigeria to be more organized, proactive, and locally integrated and to address corruption, which has made humongous expenses on Nigeria's counterterrorism efforts less effective.

Finally, this paper has filled a gap in the existing literature on African counterterrorism policy by revealing both the strengths and weaknesses of NACTEST through document analysis and comparisons with strategies from both developed and developing countries. Generally, many authors research each of these countries' counterterrorism. There has been little or no attention to comparison between these states. And those who compared only compared two countries, not four countries, and did not use NACTEST as the case in this paper (Mbaso, 2023). Thus, there has not been an adequate investigation into the analytical comparison between Nigeria, the

United States, Saudi Arabia, and Kenya's counterterrorism strategies. The paper has filled this gap.

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