

Senegal: A Model of Community Resilience, Legal Accountability, and Counter-Terrorism in the Sahel?

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1. Challenging Context

The coastal states of West Africa are experiencing a heightened state of anticipatory anxiety, stemming from concerns that violent Jihādist groups are encroaching upon their borders and moving southward from the Sahel. In Ghana, Benin, Côte d'Ivoire, Togo and Senegal this fear has led to an increase in commentaries, political statements and programmes aimed at countering violent extremism and terrorism.¹ Despite being in a region where terrorism is a notable threat, Senegal has not officially recorded any terrorist attacks. However, for the last four years, the country has experienced occasional security incidents along its south-eastern border with Mali. The Kédougou and Tambacounda regions, which border Mali's Kayes region, have come under growing security threats. In Mali, attacks by violent extremist groups, which were initially confined to the northern and central areas, have slowly expanded, including westward towards Senegal.²

In Senegal, the concern over terrorist attacks has a long history. A 2017 report by the Friedrich Ebert Stiftung ('FES') reveals that a majority of Senegalese consider terrorism to be one of the leading threats to their personal safety, notwithstanding the ongoing conflict in Casamance that has continued for over 33 years and still represents a real danger.³

In Senegal, Muslims make up 94 per cent of the population, and there is a concerning increase in religious radicalism among this group. The growth of Salafism, especially in the adjacent State of Mauritania continues to linger. A significant number of people, who assert their connections to religious leaders or brotherhoods, are becoming more prominent in the country. The increase in small arms and light weaponry contributes to the security challenges faced by Senegal. Furthermore, there are safety concerns linked to the coastal areas. Senegal's western border is the Atlantic Ocean, which poses an opportunity for terrorists, where even the slightest oversight could lead to a critical situation for the nation. The prevalence of illicit trafficking in human beings, drugs and tobacco is escalating.⁴

The porosity of borders poses a significant risk to the stability of not

only the desert region, but the entire country. To the east, the neighbouring State of Mali presents one of the most considerable threats. It is currently grappling with armed Jihādist groups that are advancing southward and may infiltrate Senegalese territory, particularly considering that the instability in Mali has compelled many displaced individuals to relocate to the eastern part of Senegal. To the south, the ongoing Casamance conflict exacerbates Senegal's vulnerability.⁵

Extant study by Senegalese analysts highlights that those at risk of violent radicalism are often marginalized within society. These militants, who have become estranged from their families and a society they view as sinful, are particularly vulnerable to recruitment by international Jihādist groups, especially in an environment where Al-Qaeda in the Islāmic Maghreb is making strides to enhance its image through social media, notably in West Africa. The ideological reach and financial strength of Jihādist Salafism are bolstered by its access to petrodollars and the social services offered by their charities (which provide educational and social services that are lacking from state provisions).⁶

According to Sambe and Ba, Senegalese participants interviewed in the Dakar region expressed their concerns for Senegal, noting that "the youth are capable of committing suicide for the sake of Islam for two reasons. The first is the brainwashing that occurs in the numerous *Wahhabite* schools where the state has no oversight over the teachings. The second is poverty, as the Islamists have financial resources and are willing to provide assistance".⁷ The pro-Jihādist narrative in Senegal is supported by three main pillars: pan-Islāmic solidarity, hostility towards the brotherhoods, and a strong anti-Western attitude, although several socio-economic factors may also be significant.⁸

According to the National Employment Survey in Senegal, conducted by the National Agency of Statistics and Demography, Senegal's unemployment rate rose to 20.3 per cent in the third quarter of 2024, compared to 19.5 per cent during the same period in 2023.⁹ The most recent value is 21.7 per cent as of the first quarter of 2025, an increase compared to the previous value of 20 per cent.¹⁰ The data presents a growing challenge in the country's labour market and bodes ill for youth vulnerability to recruitment into violent extremism.¹¹

The transnational character of actors, porosity of borders, and the shrinking distances enabled by modern communication technologies appear to favour the spread of the Jihādist phenomenon in West Africa.

⁵ *Ibid.*

⁶ Bakary Sambe and Djibril Ba, "The Potential Danger of Religious Radicalism in Senegal", in *ISS Today*, 27 June 2013.

⁷ *Ibid.*

⁸ *Ibid.*

⁹ "Senegal: Unemployment rate climbs to 20.3% in Q3 2024", *West Africa Democracy Radio*, 9 January 2025.

¹⁰ TheGlobalEconomy.com, "Senegal: Unemployment Rate" (available on its web site).

¹¹ Sambe and Ba, 2013, see *supra* note 6.

¹ Muhammad Dan Suleiman, "The Jihadists are Coming! Abyssal Thinking and Spatial Politics of Un/Knowing in Ghana's Terrorism Discourse", in *Critical Studies on Terrorism*, 2023, vol. 16, no. 4, pp. 620–647; United States Department of State, "Country Reports on Terrorism 2023: Senegal", 2023 (<https://www.legal-tools.org/doc/sdh6zqrz/>); Bakary Sambe, "Terrorism: Leveraging Social Cohesion and Security to Counter Expansion into Senegal", Timbuktu Institute – African Center for Peace Studies, 27 May 2025 (<https://www.legal-tools.org/doc/f70rs9l0/>); "Increase in JNIM Attacks Puts Senegal in Crosshairs", *ADF*, 20 May 2025; Daniel Eizenga and Amandine Gnan-guénou, "Recalibrating Coastal West Africa's Response to Violent Extremism", Africa Security Brief No. 43, Africa Center for Strategic Studies, 2024.

² Paulin Maurice Toupane, "Preventing Violent Extremism in South-Eastern Senegal", in *ISS Today*, 16 December 2021.

³ See Mohamed Eljarh, "Security Challenges and Issues in the Sahelo-Saharan Region: The Senegal Perspective", FES, July 2016 (<https://www.legal-tools.org/doc/aoh6lcr2/>).

⁴ *Ibid.*

Senegal is not isolated from this spread.¹² In spite of the regional instability that envelops Senegal, the country remains a symbol of peace and stability in the region. However, Senegal was embroiled with a low-scale conflict in the southern Casamance region involving the Movement of Democratic Forces of Casamance (‘MFDC’).¹³

The presence of various types of firearms, including AK-47s and other automatic weapons, has also been reported in the gold mining sites of the south-eastern Kédougou region. These arms are allegedly trafficked from Mali. In addition to Kédougou and Casamance, Madina Gounas has emerged as a significant hub for arms trafficking in the country. The arms in Madina Gounas primarily come from Guinea and Guinea-Bissau, and are criminally deployed throughout the vast south-eastern region of the country, including the Kédougou mining sites.¹⁴ While security concerns in the Sahel, particularly in neighbouring Mali and Mauritania, have heightened Senegal’s vulnerability to violent extremism, Senegal has played a pivotal role in both regional and international initiatives aimed at addressing the crises in Mali.¹⁵

2. Senegal’s Counter-Terrorism Laws, Intelligence Co-ordination Mechanisms, and ‘Countering Violent Extremism’ Initiatives

Even if Senegal suffers porous borders, socio-economic challenges, and the spread of Salafism, the country possesses significant resilience factors that have, so far, limited the infiltration of Jihādists. These factors consist of strong social cohesion, widespread religious moderation, a robust legal framework, and competent security forces.¹⁶

2.1. Security, Regulations and Community Resilience

The government of Senegal, in collaboration with international development partners, has acknowledged the gravity of the threats posed by violent extremism and terrorism to the nation. This acknowledgment serves as the foundation for the national response and reflects a unified commitment to fostering peace and security in the region. A pivotal aspect of this commitment is the training and equipping of border patrol units within the Senegalese gendarmerie. These units are stationed along Senegal’s borders with Mali, Mauritania and Guinea, which are areas where the threat of violent extremism is most acute. The support provided by the United States government (‘USG’) in this context includes the provision of essential equipment, satellite imagery, and training in intelligence surveillance and reconnaissance. This comprehensive approach significantly enhances the effectiveness of gendarmerie operations, thereby helping to secure Senegal’s borders against infiltration by extremist groups.¹⁷

The United States has also committed resources to develop Senegal as a key counter-terrorism centre in the region. By means of the Diplomatic Security Regional Tactical Training Center in Thies, the USG delivers training to both Senegalese law enforcement and security personnel from different parts of Africa. This programme enhances Senegal’s position as a leader in regional security efforts, equipping local forces with essential skills and knowledge to combat violent extremism successfully.¹⁸

Although military and law enforcement actions are vital, they are not adequate by themselves. The struggle against violent extremism must also include local communities and civil society. Consequently, initiatives that encourage co-operation between law enforcement and local communities, particularly in areas at risk of extremist influence, are being promoted. One of such initiative focuses on bringing together law enforcement and female community members on both sides of the Senegal–Mauritania border. This seeks to boost community engagement with local law enforcement, enhance reporting systems, and foster female involvement in essential security discussions. By enabling women to take an active part in security matters, development partners and the

state fortify the social fabric that unites our communities.¹⁹

Senegal has made notable advancements in the fight against terrorism financing, although challenges remain. Financial institutions, particularly banks, exhibit a greater understanding of anti-money laundering and counter-financing of terrorism (‘AML/CFT’) risks than their non-banking counterparts and Designated Non-Financial Businesses and Professions (‘DNFBPs’). While there is an increase in the number of Suspicious Transaction Reports (‘STRs’), mainly from the financial sector, the reporting from DNFBPs remains insufficient. Additionally, AML/CFT inspections are consistently performed for financial institutions, whereas they are virtually non-existent for DNFBPs, many of which lack a specific regulatory authority. Ongoing investigations into money laundering are taking place, but some reports from the Financial Intelligence Unit (‘FIU’) are considered too brief to provide significant insights, and parallel financial investigations are not conducted in a systematic manner. There have been some successful convictions for money laundering, especially for predicate offences committed internationally, and certain confiscation orders have been carried out. However, there is no convictions for terrorism financing.²⁰

These points suggest that Senegal’s anti-terrorism financing measures are inconsistent across various sectors. The greater understanding and compliance within the financial sector, in comparison to the DNFBPs, indicate a significant vulnerability where a lack of regulation and oversight could be exploited for illicit purposes. The low incidence of STRs from DNFBPs and the absence of inspections in this area highlight a potential blind spot for authorities. Furthermore, the challenges faced by judicial authorities due to brief reports from the FIU and the lack of systematic parallel financial investigations imply that the country’s investigative and prosecutorial capabilities require enhancement to effectively address financial crimes. While some progress has been made in terms of money laundering convictions and asset confiscations, the absence of convictions specifically for terrorism financing points to a gap in the legal framework or its enforcement.²¹

2.2. Role of Civil Society, Religious Leaders, and Education Systems in ‘Countering Violent Extremism’ Efforts

Senegal is facing a potential threat from the terrorist organization *Jama’at Nusrat al-Islām wal-Muslimin* (‘JNIM’), which operates in the tri-border area with Mali and Mauritania and seeks to increase its influence. Despite vulnerabilities such as porous borders and socio-economic challenges, Senegal has shown strong resilience against JNIM’s infiltration. The country’s robust social cohesion serves as a cultural shield, with a 2024 survey indicating that 75 per cent of Kédougou residents attribute social peace to cultural traditions, making it difficult for JNIM to exploit inter-community tensions. Moreover, Senegal’s widespread religious moderation, particularly through the influence of Sūfī brotherhoods, counters JNIM’s radical Salafist ideology. A survey found that only four per cent of residents in eastern border regions are acquainted with someone holding extremist views, and religious leaders are viewed as key partners in preventing radicalization. These elements, along with capable security forces, position Senegal to effectively resist JNIM’s expansion by reinforcing its existing strengths.²²

2.3. Legislative Framework

On 12 February 2007, the President of Senegal, Abdoulaye Wade, noted that the proliferation and frequency of terrorist attacks carried out by increasingly organized groups using sophisticated means have made all states vulnerable. Thus, the fight led by the international community against terrorism necessitates a restructuring of domestic legislation. In this regard, Senegal modified its Penal Code, and promulgated an Act tagged Law No. 2007-04 of 12 February 2007. The anti-terrorism measures introduced into the Penal Code require modifications to criminal procedure to provide the maximum possible effectiveness and enhance the objective of combating terrorism, a phenomenon the President noted has intensified in recent years. The links between terrorism and money

¹² *Ibid.*

¹³ Centre for Humanitarian Dialogue, “Senegal Government and MFDC Separatists Advance Peace Process with Roadmap for Disarmament”, 5 August 2022 (<https://www.legal-tools.org/doc/kciku30w/>).

¹⁴ Africa Organised Crime Index, “Senegal” (available on its web site).

¹⁵ Naila Salihu and Devante Duncan, “Potential Drivers of Jihadism and Radicalisation in Senegal”, KAIPTC Occasional Paper No. 45, September 2022.

¹⁶ Sambe, 2025, see *supra* note 1; United States Department of State, 2023, see *supra* note 1.

¹⁷ United States’ Embassy Senegal, “Countering Violent Extremism Conference at WARC”, 28 August 2024.

¹⁸ *Ibid.*

¹⁹ *Ibid.*

²⁰ The Inter-Governmental Action Group Against Money Laundering, “Anti-Money Laundering and Counter-Terrorist Financing Measures – Senegal”, May 2018, p. 2.

²¹ *Ibid.*

²² Sambe, 2025, see *supra* note 1.

laundering, corruption, and trafficking of dangerous weapons and materials led to the establishment of a specialized section at the prosecution level, specialized investigative offices, and a court composed exclusively of magistrates with specialized knowledge in the fight against terrorism. The Dakar Court of Appeal and the Dakar Regional Court assumed jurisdiction over the entire national territory in this area.²³

According to Law No. 2007-04, the preliminary investigation procedure entrusted to specialists has been adapted to better account for the specific nature of the matter by strengthening the anti-terrorism section, whose main members must have the status of judicial police officers. Investigators are given significant powers to optimize the search for evidence. For example, visits and searches can be conducted at any time, and the consent of the persons in whose homes they take place is not required. The periods of police custody are the same as those provided for in investigations related to offences against state security. However, these operations are carried out under the supervision of the public prosecutor's office or the investigating judge in charge. The new provisions also allow for the statute of limitations for public prosecution for the category of crimes referred to in Articles 279-1 to 279-3 of the Penal Code to be extended to 30 years. The statute of limitations for the pronounced sentence is 40 years from the date the decision becomes final.²⁴

Senegal has signed and ratified most of the universal legal instruments to combat terrorism. Thus, at the national level, many new legislative and regulatory statutes have been adopted. Despite these measures, the threat of terrorism persists in Senegal. To ensure that the criminal justice system effectively contributes to the prevention and fight against terrorism, a well-defined strategy must be devised. This strategy should encompass criminalization, investigative powers and techniques, relevant rules of evidence, and international co-operation. The objective is to successfully integrate substantive legal principles and procedural mechanisms to mitigate the frequency and severity of terrorist violence, in full compliance with the constraints and protections of the criminal justice system.²⁵

Sometimes, driven by the urgency to confront a specific threat, the state has improvised new approaches and, in so doing, strained the limits imposed by the law and by due process guarantees to an extreme degree. This context explains the politicization of anti-terrorism strategies in Senegal in recent time. In the wake of political upheavals that characterized Senegal with widespread protest from 2021 to 2024, on 25 June 2021, the national assembly of Senegal approved legislation that modifies the Penal Code and the Criminal Procedure Code. These counter-terrorism laws define 'terrorist acts' to include, among other things, 'seriously disturbing public order', 'criminal association', and 'offences related to information and communication technologies', all of which are punishable by life imprisonment. Human Rights Watch has indicated that this ambiguous definition could be misused to criminalize peaceful political activities and violate the rights to freedom of association and assembly. The laws criminalize the act of 'inciting others' to commit acts of terrorism, but they do not provide a definition for incitement, which poses a risk to media freedoms and freedom of expression by creating a potential avenue for prosecuting free speech. Additionally, the laws would hold leaders of associations, trade unions or political parties criminally liable for 'offences committed' by their organizations, which threatens the right to associate. In cases where an organization is found guilty, the laws permit the confiscation of the leaders' and the organization's assets. The laws also grant law enforcement officials additional powers to observe a terrorism suspect without needing to seek authorization from a judge.²⁶

In spite of the foregoing legislative malfeasance, Senegal presents impressive credentials on international jurisprudence in the trial of serious crime against humanity. Thus, as the reign of terror envelops the

Sahel region with terrorists and state security actors committing wanton human rights abuses in neighbouring states,²⁷ Senegal offers a beacon of hope and examples that can be replicated by other countries in the region. Therefore, the next section analyses the experience of Senegal as a champion of international criminal justice through case of former Chadian dictator Hissène Habré, who was charged and tried in Senegal. The trial constitutes an important milestone for victims' groups in their quest for justice.

3. Senegal as a Champion of International Criminal Justice: A Model of Cross-Border Prosecution of Serious Crime

Counter-terrorism operations have often resulted in human rights abuses in all three countries (Senegal, Mali and Burkina Faso), with security forces in the latter two facing allegations of potential war crimes and crimes against humanity. The Malian Armed Forces and the Russian state-sponsored Africa Corps (previously known as the Wagner Group) have reportedly been involved in possible war crimes and crimes against humanity. These alleged violations include summary executions, indiscriminate airstrikes, sexual violence, pillaging, and the torture of civilians. Additionally, state-sponsored militias in Burkina Faso, such as the Volunteers for the Defense of the Homeland, have been linked to serious ethnic-based crimes.²⁸ The counter-terrorism operations by the Burkina Faso army allegedly led the massacre of more than 130 ethnic Fulani civilians (potentially many more) by pro-government militias in the western Boucle du Mouhoun region in March 2025. A massacre around Solenzo took place during Operation 'Green Whirlwind 2' (Operation Tourbillion Vert 2), a major weeks-long campaign led by Burkinabè special forces that resulted in extensive civilian casualties and the large-scale displacement of Fulani people. The al-Qaeda-linked JNIM executed a series of retaliatory attacks in Sourou province, apparently targeting villages that it viewed as assisting the military, killing at least 100 civilians.²⁹ This provides a parallel that is well situated in Senegalese jurisprudence.

The prosecution of Hissène Habré by the Extraordinary African Chambers in Senegal establishes an important legal and historical precedent, illustrating how both the international community and African institutions can ensure accountability for crimes against humanity, war crimes and torture that are currently being reported in Mali and Burkina Faso. This case highlights the legal frameworks that exist for confronting these atrocities and sets a benchmark for the potential role Senegal could assume in future prosecutions. Habré was indicted by the Extraordinary African Chambers on 2 July 2013 for crimes against humanity, torture and war crimes, charges based on his rule as Chad's President from 7 June 1982 to 1 December 1990. The specific allegations against him included murder, summary executions, enforced disappearances and torture committed against political opponents and particular ethnic groups such as the Hadjerai, Zaghawa and residents of southern Chad. The Court's authority included genocide, crimes against humanity, war crimes and torture.³⁰ The pursuit of justice against Habré was mainly propelled by the victims and their advocates, rather than the Chadian government.³¹

The Extraordinary African Chambers, formed within Senegal's judicial system in Dakar, executed a detailed investigation that spanned 19 months. The investigative judges, along with their teams, carried out four missions to Chad, collecting testimonies from 2,500 direct and indirect victims and witnesses, including former officials of Habré's government. They also relied on a significant body of existing evidence, including a 1992 report from the Chadian Truth Commission that accused Habré's government of systematic torture and the deaths of 40,000 individuals. Importantly, the judges obtained tens of thousands of documents from the DDS (Habré's secret police), which had been retrieved by Human Rights

²³ Senegal, Loi no 2007-04 du 12 février modifiant le Code de Procédure pénale relatif à la lutte contre les actes de terrorisme, 12 February 2007 (<https://www.legal-tools.org/doc/45931f/>).

²⁴ *Ibid.*

²⁵ See Mamane Lawal Barry Mamadou *et al.*, "What Legal and Institutional Frameworks are in Place for the Protection of Participants in Terrorist Trials? The Examples of Burkina Faso, Niger and Senegal", in *The International Institute for Justice and the Rule of Law*, 22 December 2022.

²⁶ Human Rights Watch, "Senegal: New Counterterrorism Laws Threaten Rights", 5 July 2021 (<https://www.legal-tools.org/doc/i5df472i/>).

²⁷ United Nations Security Council, "Activities of the United Nations Office for West Africa and the Sahel Report of the Secretary-General", 3 January 2023.

²⁸ Global Centre for the Responsibility to Protect, "Central Sahel (Burkina Faso, Mali and Niger)", 15 July 2025 (<https://www.legal-tools.org/doc/or0o0ysa/>).

²⁹ Human Rights Watch, "Burkina Faso: Army Directs Ethnic Massacres Armed Forces, Militia Kill Over 130 Civilians; Reprisal Killings by Islamist Armed Group", 12 May 2025 (<https://www.legal-tools.org/doc/hmdsq92h/>).

³⁰ Human Rights Watch, "Q&A: The Case of Hissène Habré before the Extraordinary African Chambers in Senegal", 3 May 2016 (<https://www.legal-tools.org/doc/600bi6yt/>).

³¹ *Ibid.*

Watch in 2001. These documents included daily records of prisoners and deaths, interrogation and surveillance reports, which illustrated Habré's direct control over the DDS. An analysis of these files uncovered the names of 1,208 individuals who were killed or died in detention, as well as 12,321 victims of human rights violations.³²

The Court's convictions brought to an end an extraordinary saga in African politics and historical justice. The cruel and brutal methods Habré sanctioned in order to hold power have been revealed to the world, along with the shocking methods employed by his network of secret police and torturers who enforced his power. The idea that former leaders, figures of terror, and criminal warlords can expect to escape judgement for their crimes was successfully challenged. This remarkable achievement was brought about by the tireless dedication of a small number of Chadian lawyers and victims who refused to give up.³³ In March 2024, victims of Habré's reign of terror reportedly began receiving compensation amounting to a total of USD 16.5 million (10 billion CFA francs).³⁴ The case demonstrates that universal jurisdiction is an important safety net to ensure that suspects (including terrorists) of atrocities do not enjoy impunity in a third state when they are neither prosecuted before courts in the country where the crimes were committed nor an international jurisdiction.³⁵

The funding for the Extraordinary African Chambers comes primarily from donor countries. In November 2012, Senegal and these donor nations agreed on a budget of EUR 8.6 million (at the time, USD 11.4 million) to fund the Habré trial. Financial commitments were made by: Chad (2 billion CFA francs or USD 3,743,000), the European Union (EUR 2 million), the Netherlands (EUR 1 million), the African Union (USD 1 million), the United States (USD 1 million), Belgium (EUR 500,000), Germany (EUR 500,000), France (EUR 300,000), and Luxembourg (EUR 100,000). The Netherlands extended additional support to the Outreach Consortium. Canada, Switzerland and the International Committee of the Red Cross contributed technical assistance. A Steering Committee, chaired by the African Union and including Senegal and the donors, was responsible for receiving and approving periodic reports from the administrator.³⁶

4. Conclusion and Recommendations

The discussion in earlier paragraphs offers some lessons and recommendations for building and countering terrorism in the Sahel. While Senegal's resilience provides direct insights, the Habré trial offers a broader lesson on accountability and international co-operation as terrorism festers in the context of poor accountability and enforcement of norms.

How Senegal has effectively countered the expansionist agenda of JNIM and other terrorist groups by utilizing its internal strengths provides a clear model for other nations. The strong social cohesion in Senegal, demonstrated through mutual respect and inter-ethnic marriages, acts as a 'cultural shield' against extremist organizations such as JNIM, which seek to exploit divisions. This suggests that it is vital for governments and communities to actively promote and reinforce cultural traditions and practices that unite diverse groups. Governments can achieve this by supporting community-led cultural festivals, art initiatives, and educational programmes that celebrate common heritage and encourage mutual respect, while also safeguarding individual freedoms and es-

chewing any form of enforced assimilation.

The widespread commitment to moderate Islamic teachings, especially through Sufi brotherhoods, serves to counter radical ideologies. By cultivating a profound, personal connection with God,³⁷ these traditions highlight the importance of spiritual development and social unity rather than political extremism, thus enhancing community resilience against the allure of radicalism. Governments of neighbouring states can collaborate with these influential figures, particularly in border areas where external influences may be more pronounced. Despite Senegal's clear strengths, the country faces vulnerabilities such as porous borders and socio-economic challenges. Therefore, Sahelian countries facing violent extremism and terrorism must not only leverage their strengths, but also implement targeted policies to address their weaknesses. For example, investing in economic development in marginalized border regions can diminish the allure of extremist groups.

Senegal provides a significant lesson on the importance of justice and accountability in a region that is facing instability and impunity. The prosecution of Hissène Habré was mainly fuelled by the victims and their advocates, who fought for years despite facing governmental opposition and delays. This demonstrates that empowering victims to seek justice can be a potent agent for change. It signifies that even former leaders are not above the law, which can assist in breaking the cycle of impunity that extremist factions often leverage.

The necessity of international and regional co-operation should not be underestimated. The successful trial of Habré was made possible through the collaboration of Senegal, Chad, the African Union and various international benefactors. The funding and technical support from a wide range of partners highlight that addressing complex regional issues such as violent extremism and human rights abuses requires a unified, multi-faceted approach. This can be applied to counter-terrorism by establishing regional frameworks for intelligence sharing, law enforcement and capacity-development. The trial's budget of EUR 8.6 million, funded by several nations, serves as a tangible example of this collective responsibility.

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³² *Ibid.*

³³ See, generally, Celeste Hicks, *The Trial of Hissène Habré: How the People of Chad Brought a Tyrant to Justice*, Bloomsbury Publishing, London, 2018.

³⁴ International Commission of Jurists, "Chad: Hissène Habré's victims receive \$16.5 million", 5 March 2024 (<https://www.legal-tools.org/doc/gg26hzs8/>).

³⁵ Human Rights Watch, 2016, see *supra* note 30.

³⁶ *Ibid.*

³⁷ Lamin Sanneh, "Saints and Exemplars", in William Schweiker (ed.), *Encyclopedia of Religious Ethics*, 2022, John Wiley & Sons Ltd., Hoboken, pp. 427–436.



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