

IMPLEMENTING THE COMMON STANDARDS OF POLICING FOR EASTERN AFRICA

A GENDERED ANALYSIS



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INTRODUCTION

The East African Community (EAC) has made significant strides in terms of establishing harmonised regional policing standards through, for example, the development of the Common Standards for Policing in Eastern Africa (CSP).¹ These standards were developed in 2010 through a collaborative process between the EAC and the East African Police Chiefs Cooperation Organisation (EAPCCO). The standards can be regarded as a *de facto* code of conduct for police and effectively operate as a guiding compass, ensuring that the police carry out their duties in alignment with regional and international human rights agreements. The standards draw from the existing human rights framework while addressing four central themes relating to policing: the role of the police, policing in accordance with the rule of law, police actions and police organisations.

Together with the Raoul Wallenberg Institute of Human Rights and Humanitarian Law (RWI), the African Policing Civilian Oversight Forum (APCOF) is seeking to promote and facilitate the effective implementation of the CSP. Fostering substantive gender equality within policing is interlinked with the implementation of the CSP. This is because gender equality promotes fairness and inclusivity but also strengthens overall compliance with human rights and the rule of law.² While the CSP make specific references to gender and women as a group,³ Article 5(3e) of the EAC Treaty further demonstrates the region's pledge to fostering gender equality. It does this through its commitment to 'mainstream gender in all its endeavours and enhance the role of women in cultural, social, political, economic and technological development'.⁴ The Uganda Police Force (UPF) has also developed a progressive gender policy that aligns with the existing national gender policy. The UPF has further developed a gender strategy and action plan. Most notably, the UPF has implemented a range of institutional processes aimed at improving recruitment in this area.⁵

Despite these positive developments, there have been a number of implementation gaps, including gendered barriers to equal representation. This was underscored in a 2021 APCOF study,⁶ as well as a 2023 Elsie Initiative Fund report.⁷ Challenges in gender-sensitive policing have significant human rights consequences, discussed in detail below. Failing to foster substantive gender equality carries negative implications for policing as well as the risk of potential financial and reputational damage to the UPF. Fostering gender equality is key to improving trust and confidence in the police within local communities, which is critical for police effectiveness.

Given that a stated goal of the UPF is to promote compliance with the CSP, a risk analysis was utilised as a tool to measure compliance and to identify potential pitfalls. By proactively

addressing risks, the likelihood of successfully implementing the CSP and the UPF's existing gender policy is increased. A risk analysis can further assist the UPF in avoiding or minimising potential setbacks, delays or failures. The study therefore identified and analysed potential risks and their underlying causes while developing practical engendered solutions (within the ambit of policing) to mitigate these risks.

PURPOSE, OBJECTIVES AND METHODOLOGY

The primary objective of the risk assessment study included identifying the contextual risks and vulnerabilities undermining compliance with the UPF's gendered commitments under its own internal policies, the CSP and other regional and international human rights norms. The risk assessment further sought to understand the underlying causes and drivers contributing to these risks. Ultimately, the study intends to improve existing measures aimed at fostering gender equality through proposing feasible and effective solutions to mitigate the identified risks and promote compliance within all levels of the UPF. This report summarises the study findings and risk assessment results and proposes actionable recommendations for the UPF.

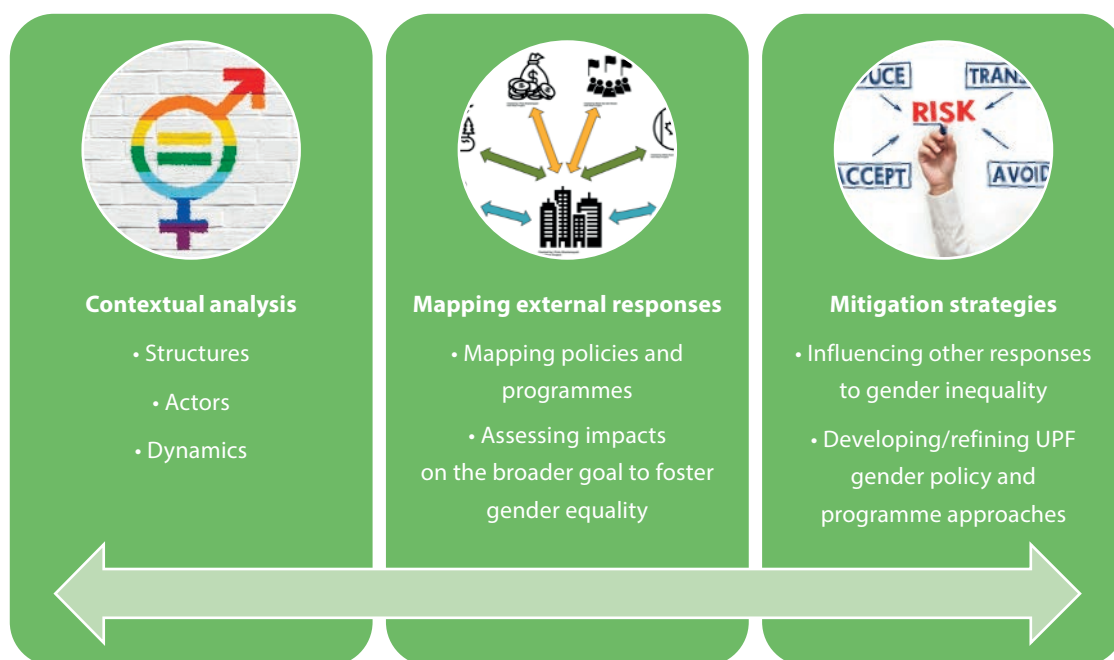
In terms of methodology, the study was desk based,⁸ drawing from existing literature, policies and reports related to gender,⁹ diversity and risk management within the UPF. It utilised the assessment models popularised by the Department for International Development (DFiD),¹⁰ the United States Agency for International Development (USAID)¹¹ and the United Nations (UN)¹² to identify specific institutional-, societal- and individual-level risks. The methodology facilitated dynamic analysis, collaboration and a multidisciplinary approach to understanding gender-responsive policing. The risks identified were rated in terms of their capacity to foster or hinder a gender-sensitive approach to policing.

The recommendations based on the findings of the risk assessment are designed for utilisation by the UPF and its stakeholders to support the management of risk and gender-sensitive police reform efforts within a human rights framework.

Drawing from a previous report on the status of women in the UPF¹³ as well as previous assessments on the extent to which the CSP have been implemented in the UPF,¹⁴ this assessment particularly seeks to understand and address:

- The risk of persistent discriminatory gendered norms on achieving equal representation while fostering a gender-sensitive approach to policing in the UPF.
- The institutional, programmatic and operational challenges within the UPF that exacerbate gender inequality while preventing equal representation.
- The opportunities to improve the effectiveness of gendered police reform interventions in contributing to gender equality and risk prevention, mitigation and reduction.
- How these opportunities can be strategically prioritised and implemented at an organisational and managerial level within the UPF.

The remainder of this report is structured as follows: the next section draws on the existing literature to identify the relevant structures (social, legal, political and economic), actors (interests, relations, obligations, capacities and incentives) and dynamics (gendered roles, norms, power dynamics and accountability) that influence gender-responsive policing. The report then provides an analysis of existing responses and measures from a policing perspective, and their cumulative impacts on identified risks, including gender equality, diversity and gender representation. Thereafter, it draws on this analysis to identify and prioritise key strategies and options for mitigation measures to promote gender-responsive policing.



RELEVANT STRUCTURES, ACTORS AND DYNAMICS

Research has indicated the integral importance of harnessing women's knowledge, skills and talent within policing.¹⁵ In order for gender-responsive policing measures to be successful, however, they need to be responsive to the specific needs and experiences of Ugandan women. This section therefore analyses the relevant social, legal, political and economic structures that shape gender relations in Uganda.

While research¹⁶ demonstrates that the Ugandan government has made significant progress in attempting to increase opportunities for women, an analysis of specific sectors¹⁷ reveals that women continue to experience daunting challenges. For example, women continue to face significant barriers in the fields of education, health, land, employment, and safety and security.¹⁸ These gendered challenges in Uganda are influenced by a complex web of multifaceted and interconnected elements made up of both external social, economic and legal factors, as well as internal organisational and operational determinants. This inevitably impacts gender equality within broader social relations, as well as within the UPF.

In terms of external factors, the Covid-19 pandemic continues to have a devastating impact globally on gender equality and the alleviation of poverty.¹⁹ Intersecting with this global crisis are the existing social norms and patriarchal attitudes that shape women's socio-economic position within Ugandan society. While women play an integral part in the country's economy and have gained access to education and seats in Parliament, they remain primarily responsible for child care.²⁰ This gendered burden of care together with insufficient socio-economic control and a lack of decision-making power²¹ inevitably intersect with internal UPF human resource policies and practices that are unresponsive to gendered caring duties.²² This ultimately serves as a key barrier to recruitment, while cultural discrimination tends to stall women's career progression.²³

These socio-economic influences shape the extent to which Ugandan women are able to experience agency, freedom of choice, access to resources and access to justice. Powerful indicators of the impact of gendered roles and systemic inequality include the high maternal mortality and adolescent birth rates in Uganda. According to human rights activists and the World Health Organisation, the elevated adolescent pregnancy rate is specifically linked to 'statutory rape, child sexual exploitation, a high rate of school dropouts, and limited knowledge of contraception among teenagers.'²⁴

In terms of legal influences, the government has made a number of efforts to address gender inequality. Article 21 of the 1995 Constitution specifically provides that all persons are equal before

the law in all spheres, and that they enjoy equal protection of the law. The Constitution draws inspiration and guidance from international instruments such as the the African Charter on Human and Peoples' Rights.

In spite of the constitutional commitment to equality, this right has not been adequately translated into legislative provisions that empower women. For example, women continue to experience restricted access to financial services, uneven inheritance rights and unequal access to land assets.²⁵ While the Constitution views women as equal in dignity and rights, this has not yet been translated into substantive gender equality for Ugandan women.²⁶

Specific legislation, such as the Land Act of 1998, has been criticised for failing to protect women's interests. For example, despite the Act 'prohibiting decisions...that deny women access to ownership, occupation or use of any land',²⁷ it has been criticised for reinforcing patriarchal norms. In particular, the Land Act has become infamous for its 'missing amendment', a co-ownership clause which was debated and approved in Parliament but did not appear in the final version of the Act.²⁸ The Land Act also fails to effectively protect widows who seek to inherit their husband's land.²⁹ While land reforms such as property co-ownership have increased women's land ownership, men remain more likely than women to own land.³⁰

As the most extreme manifestation of gender inequality, gender-based violence (GBV) also remains a formidable challenge in Uganda. Examples of prevalent forms of GBV include domestic and intimate partner violence, sexual violence, child marriage, trafficking in persons and crimes involving violence or threats of violence against the LGBTQI community.³¹ National demographic data from 2020 revealed that 56% of married women between the ages of 15 and 49 had reported experiencing physical and/or sexual violence by a husband.³²

Research has further revealed the persistent lack of investigation of and accountability for GBV in Uganda.³³ Specific challenges relating to the policing of GBV include victim blaming, corruption and entrenched gender bias.³⁴ There is also a lack of awareness as to what constitutes domestic violence, while victims continue to face stigmatisation and a lack of responsiveness from mostly male police officers.³⁵ While the Domestic Violence Act defines sexual abuse broadly, it does not explicitly reference marital rape.³⁶

A 2022 divorce case underscored the legal system's failure to address the systemic discrimination experienced by Ugandan women. While courts had typically ruled in divorce cases that assets should be equally split upon divorce, in 2022, an appeal court overturned a high court divorce order which had given a couple an equal share in the matrimonial home. The court decided that the woman in the marriage, who had done most of the housework, was only entitled to 20% of the assets.³⁷ While the male partner in this case had receipts to show how much he had paid to build and maintain the home, the woman did not have any receipts for her unpaid caring work. This reveals the low value that continues to be placed on women's unpaid caring work as well the complex gendered dynamics that characterise Ugandan society.

As the Women's Pro Bono Initiative aptly observed, 'it is problematic that a wide discretion is left to judges to determine what percentage a spouse's non-monetary contribution is valued at'.³⁸ This discretion is largely due to gaps in the existing legal framework. For example, the Divorce Act dates back to 1904. While there have been piecemeal developments through jurisprudential decisions, the Act has not yet undergone a comprehensive revision to ensure that it is responsive to women's needs in a modern society.

While the focus of this risk analysis is on the police response to gender inequality, law enforcement must be equipped to understand these existing challenges and how they impact upon women. For example, law enforcement must comprehend how economic dependency contributes to violence and discrimination against women.³⁹ Even if police officers are unable to influence legislative reform, they are able to be sensitive and responsive to women's challenges on the ground, while seeking to respond proactively to women and to crimes that predominantly affect them. This contextual analysis underscores that efforts to advance gender equality need to be nuanced and multifaceted.

Part of what makes engendering the police response to GBV complex is the complicated nexus of actors who play a role in influencing gender equality. For example, the UPF plays a clear role in driving or hindering gender-responsive initiatives, including training programmes for police officers. While efforts have been made to increase female representation to 30% within the UPF, an increase in representation on its own is insufficient to ensure gender transformation.

This needs to be coupled with addressing institutional barriers, historical policing traditions, systemic patterns of discrimination and broader social and cultural norms. For example, human rights activists and local media have reported that, even when women attempt to report a rape to police, officers often blame the women for dressing indecently and thus causing the rape.⁴⁰ Police officers have also reportedly taken bribes from the alleged perpetrators to halt the investigation or they have simply dismissed the victims and refused to record the allegations.⁴¹ According to human rights activists, police personnel further lack the requisite skills and capacity to collect and manage forensic evidence.⁴²

In spite of the efforts to increase female representation within police organisations, certain police stations still do not have female officers, which serves as a barrier to rape survivors reporting their cases. While mitigation measures can be implemented, for example through ensuring that male police officers are sufficiently trained and sensitised,⁴³ it is essential to prioritise the recruitment and training of qualified female police officers who can effectively address GBV.⁴⁴ This is important to ensure a diverse workforce as well as gender representation within police organisations. It is also essential in terms of respecting the agency and choice of survivors of rape by enabling them to report their case to a female officer if they wish to do so.

In addition to improving female representation, police organisations can also be physically designed to be more gender-sensitive.⁴⁵ Examples of this include ensuring that there is adequate lighting throughout the police station and surrounding areas, ensuring accessibility for people living with disabilities, the elderly and children, and providing child-care facilities. Latrines should also be gender-segregated, private, clean and secure.⁴⁶

While law enforcement is not expected to solve the problem of gender inequality on its own, it must play a role in combating gender inequality and empowering women. Given that the overly masculinised occupational culture within police institutions often serves as a barrier to women's ability to access justice,⁴⁷ there is a need to facilitate cultural transformation within police organisations while strengthening accountability. Policing institutions therefore need to play a proactive role in tackling the root causes of structural injustice while deepening equal inclusion and participation for women.⁴⁸

As underscored by the UN Office on Drugs and Crime, gender-responsiveness is crucial for police organisations to be perceived as trusted and legitimate, especially when addressing GBV. This requires them to acknowledge and 'own the problem' of GBV, meaning that they consider it a core responsibility to respond to its occurrence and to be part of the solution.⁴⁹

The Ministry of Gender, Labour and Social Development provides policy guidance, advocates for gender equality and coordinates efforts with other government bodies. As pointed out in APCOF's *Women in the Ugandan Police Force*: 'External to the UPF, the Equal Opportunities Commission, the Ministry of Gender, Labour and Social Development, the Justice, Law and Order Sector, and the Legal and Parliamentary Affairs Committee of Parliament are mandated to call upon the UPF to account with regard to its set targets.'⁵⁰ While these accountability mechanisms have commended the UPF for the progress made in formulating the gender policy, strategy and action plan, these bodies need to work with the police to solve problems undermining their effective implementation.⁵¹

Civil society organisations, such as non-governmental organisations (NGOs) and women's rights groups, also play a critical role in promoting gender-responsive policing, providing support services to survivors and training on gender equality, conducting advocacy and awareness campaigns and collaborating with the police on policy development.

International organisations and development partners, including UN agencies such as UN Women, offer technical support, resources and expertise to strengthen gender-responsive policing practices. For example, in 2021, UN Women, in partnership with the Uganda Police's Criminal Investigation Department (CID), trained 354 investigators in handling and investigating sexual and gender-based violence (SGBV) cases in 20 project districts.⁵²

It is through the collaboration and coordination of these diverse role players that gender-responsive policing in Uganda can be effectively promoted, ensuring protection and empowerment of women and marginalised genders, while creating safer and more inclusive communities.

While this risk analysis concentrates on the scope of control pertaining to the UPF, in order to be effective, implementation strategies must be responsive to the social context and the role players involved. What police officers do is important. However, how they render their services and the manner in which they respond to the context is integral to their work. The extent to which police organisations are connected to referral services such as shelters, community partners and health-care providers is also of paramount importance.

EXISTING RESPONSES AND THEIR CUMULATIVE IMPACTS ON IDENTIFIED RISKS

As noted, the UPF has implemented measures to address gender inequality. For example, it adopted a gender policy and an action plan to improve gender representation and gender equality within the police force. The UPF also has a number of gender-sensitive structures in place that are intended to support women. As detailed below, the UPF's commitment to gender equality is further evidenced in its collaborative efforts with NGOs and international organisations that are seeking to foster gender equality within the UPF.

For example, in 2019 the UPF collaborated with APCOF in a study that focused on examining the operational barriers to recruiting female police officers into the UPF. The study found that the barriers that women face extend beyond recruitment and operational policing to include 'the UPF as an institution, the community as a protector of social norms, the national gender equality movement, and the national education system'.⁵³ The study also highlighted that barriers within the UPF tend to reinforce societal norms. The institution has historically been male-dominated, and its operational systems and approaches are designed with a male perspective.

Recruitment practices, deployment systems and training programmes are often developed without considering the specific needs and challenges faced by women.⁵⁴ Pregnancy, for example, can lead to disqualification or dropout during training, and the requirement to work in any part of the country can be difficult for female officers with family obligations.⁵⁵ Among the concluding observations made by the study is the need for 'a professional gender audit of the content, course requirements and delivery of pre-entry training with a view to considering alternatives to those that adversely impact women'.⁵⁶ This is particularly necessary where alternatives with lesser effects on women can deliver similar competencies.

The study also identified the need for more strategic and technical capacity, an increased budget and the inclusion of women in leadership roles and in decision-making spaces. While the report has been disseminated in certain policing regions (such as Aswa, North Kyoga and Kampala), it needs to be disseminated and popularised among other policing regions.

In March of 2022, a workshop was held in Kampala to further disseminate the findings of the 2019 study on women in the UPF. The objectives of the workshop included discussing the recommendations and developing an action plan. The Executive Director of the Centre for Justice Studies and Innovation (CJSI) noted that the findings of the study were aimed at paving the way for more responsive institutional recruitment policies and practices, as well as to encourage more women to participate in operational policing. A gender action plan was

developed, which delineated key areas requiring attention. For example, the action plan emphasised the need to foster political will, to cultivate gender leadership and capacity, to rectify internal recruitment policies and to alter pre-entry training requirements.

In 2022, APCOF together with Mohammed Ndifuna undertook an assessment of the extent to which the CSP had been implemented in Uganda.⁵⁷ The study found that while some progress had been made towards operationalising the CSP, these efforts were constrained by a number of factors (some of which are relevant to the current risk assessment). Examples of external factors included the Covid-19 pandemic, the 2021 elections and the militarisation of the police. In terms of internal challenges, the UPF struggled to popularise key documents and there were a number of training deficits. The review further revealed that reactionary measures were insufficient in dealing with systemic human rights violations and deeply entrenched norms.

In July of 2023, the Elsie Initiative Fund published its findings from a study on opportunities for women in peace operations. While the study was focused on the broader subject of peacekeeping, it touched on the importance of gender representation and gender equality within the UPF.⁵⁸ The study provided a number of key recommendations that can be utilised by the UPF going forward. It underscored that while a progressive policy framework exists, implementation challenges remain, particularly in relation to gender leadership and capacity, as well as pre-entry training requirements. With regard to leadership, the study elucidated that holding leaders to account is necessary in order to foster change. This risk assessment draws from a number of these recommendations in developing mitigation strategies.

KEY RISKS AND RISK MANAGEMENT STRATEGIES

The UPF clearly has an enabling policy and structural environment in place that has the potential to foster gender equality. However, in spite of this progressive framework, there are significant impediments in relation to implementation.

Most significant (gender) risks facing the UPF

The most significant (gender) risks facing the UPF include:

- Further regression in terms of its goal to increase gender representation to 30%.⁵⁹ The lack of awareness and ownership of the existing gender-related policies at all levels of the UPF, particularly at the leadership level, contributes to this risk. Societal norms also contribute to this risk.
- Failure to ensure current recruitment policies and educational requirements are responsive to women's caregiving roles and their existing educational and socio-economic impediments.
- Failure to implement the existing policy framework due to seeing compliance as a box-ticking, once-off exercise and not recognising that it necessarily entails a broader, ongoing, transformative project.
- Failure to provide gender-responsive and effective police services due to persistent gender bias within police organisations. This is particularly evident in relation to responding to GBV.
- Lack of capacity, accountability and ineffective monitoring. For example, the focus should not only be on an increased number of female police officers. Rather, emphasis should be placed on closing the gaps between male and female police officers and ensuring that female police officers (and potential candidates) are empowered in terms of their feasible options and supported by management at the highest levels. In addition, greater female recruitment alone cannot address systemic issues within law enforcement agencies, particularly if there is an entrenched patriarchal culture. In such environments, female officers may opt to leave, resulting in a stagnant overall representation despite increased recruitment efforts. There is therefore a need for accountability in relation to broader cultural and organisational transformation.

Risk mitigation strategies

In seeking to be responsive to these risks, the UPF needs to develop risk management strategies that align with its overarching objectives. Following are examples of viable risk mitigation strategies.

- Collaborate with gender experts to undertake an annual gender audit. One potential mitigation strategy is to conduct a comprehensive gender audit⁶⁰ on an annual basis. As per the study on operational barriers to women's recruitment into the UPF, it was recommended that a gender audit be done on the content, course requirements and delivery of pre-entry training for recruits. While this is necessary, it should be extended to include a comprehensive gender audit of implementation levels of key policies as well as existing levels of awareness, perspectives on gender equality and compliance levels by UPF members. Given that implementation remains a key challenge, it is necessary to undertake an in-depth audit to determine specific implementation challenges. This audit can thus serve as a diagnostic tool and assist in identifying key intervention processes,⁶¹ such as the need to invest in proactive gender bias reduction programmes, mandating female shortlists/successor pools for leadership positions, providing mentors for female officers and reviewing how the UPF supports working mothers. Support for working mothers is essential to ensure that remaining in the workforce is a feasible option for women police officers who are caregivers. With regard to developing and strengthening networks with gender experts, a potential resource is the International Association of Women Police (IAWP). As a partner of UN Women and the UN Office on Drugs and Crimes (UNODC) in the realm of gender-responsive policing, IAWP is equipped to offer valuable technical assistance, drawing from practical experience and a wealth of insights gleaned from diverse international contexts.
- Develop an effective communication and dissemination plan. Given that lack of awareness of existing policies has been identified as a key barrier to implementation, there is a need for a comprehensive gender communication and dissemination plan. Funding allocation should encompass a variety of communication channels, including social media, radio, print, television and flyers, with a focus on integrating a gender perspective into the design.
- The results of the gender audit can assist in pinpointing particular areas of concern. A communication strategy should entail communication both within the UPF and external communication strategies (such as community outreach activities). Internal communication is necessary as the existing gender policy needs to be popularised within all levels of the UPF. Efforts must be made to ensure that employees are responsive to this policy and that they are aware of its provisions and their specific role in fulfilling the policy. There is also a need to ensure that the 30% quota is implemented in each district/region.⁶² The existing quota system, while established, has the potential to generate negative reactions if not effectively communicated or if its implementation suggests that female candidates are selected based on reduced criteria to fulfil the quota. For this reason, there is a need for 'champions' within the police organisations, including male champions, to assist with outreach and accurate messaging.
- A nationwide effective internal communication strategy should encompass mentoring and networking activities for existing women police officers. As pointed out in the Measuring Opportunities for Women in Peace (MOWIP) study,⁶³ the UPF needs to review its orientation programme and how its policies, such as the gender policy and the sexual harassment policy, are explained to new recruits. This needs to be coupled with community outreach measures that effectively disseminate the existing policies, the opportunities available to women and the reports and studies that have been completed.

- Develop holistic support services for women police officers. In the realm of policing, female officers face a multitude of challenges that are both deeply personal and profoundly political. The feminist tenet ‘the personal is the political’ illuminates the indelible connection between an individual police officer’s personal experiences and the broader social, cultural and institutional context within which these experiences take place. Applying this principle, it is clear that the struggles and triumphs of female police officers serve as microcosms of a larger systemic issue, such as the prevalence of gender inequality within the criminal justice system and within broader society. Given this reality, it is necessary to develop support services that address both the private and the public aspects of a female police officer’s life.⁶⁴ For example, support services need to provide confidential counselling services that address personal issues, mental health struggles, and experiences of violence and trauma while also providing opportunities for professional development and networking opportunities. In a survey conducted by the Nebraska Association of Women Police, it was revealed that many women in policing consider leaving due to issues such as lack of equipment, mentorship and women’s health policies.⁶⁵ The survey highlighted the need for better education, conversations and policies regarding women’s health and wellness in law enforcement agencies. Key recommendations included improving maternity/paternity leave policies, including women in policy decisions and actively addressing health concerns, such as menopause and reproductive health, to improve retention and inclusive policing.⁶⁶
- There is also a need to design and implement specialised leadership development programmes tailored to address the unique challenges women may face in leadership roles within law enforcement. These programmes can offer women a supportive environment to discuss their experiences and contemplate their strengths and weaknesses without fear of judgement. This should be coupled with ensuring that women police officers are given a voice in developing these policies and implementation plans. Networking and mentoring programmes should also be introduced to ensure that women have proactive support in terms of their career progression and personal development. While women police officers have a key role to play, male leaders should also be trained on this issue to ensure that all members of leadership have the requisite gender equality knowledge and expertise.⁶⁷
- Infuse training and awareness programmes with accountable monitoring and evaluation. While there are existing policies in place, they are not being effectively implemented, and not all members of the UPF appear to be aware of their specific roles and responsibilities. There is also the impression that certain training and information sessions are reduced to a box-ticking exercise. This superficial approach can lead to a false sense of security as critical risks remain unaddressed while in-depth reflection is neglected. Training and implementation must therefore be viewed as an ongoing exercise while being infused with accountability and internal reflection. Uganda’s National Development Plan (III) presents opportunities for cross-institutional programmatic planning, implementation and reflective assessment of cross-cutting policies, with a particular focus on gender inclusivity. There is the potential for both vertical and horizontal accountability within this framework and it can be explored by the UPF to address inherent risks that may hinder effective implementation.
- There is also a need to have a nationwide roll-out of comprehensive training on gender equality and on the UPF’s gender policies. The UPF needs to work with the Department of Human Resources to detail a communication and compliance strategy. For example, many organisations create online learning and digital assessment solutions to ensure employee compliance with existing organisational policies. Employees are then offered

incentives for completing these courses or they are required to pass these assessments in order to maintain their employment. Failure to pass these assessments should result in some form of consequence. There is also a need for detailed key performance indicators to be linked to promotion. The UN Women's Handbook on Gender-Responsive Police Services for Women and Girls Subject to Violence offers examples of key performance indicators for police leadership, such as effective communication skills, adaptability and the capacity to network with external stakeholders such as women's rights groups.⁶⁸

- Develop a recruitment plan and review outputs regularly. Drawing from the annual gender audit and in collaboration with gender experts, it is necessary to develop a recruitment plan focusing on gender equality and representation. It is important to move beyond only raising awareness on gender equality and focusing on fixing internal issues; there should also be an emphasis on ensuring measurable results for police officers, particularly for women officers.

Risk assessment overview

	Identified risks/hazards	Impact	Control/mitigation measure/options	YES/ NO	Owner/ responsible party/ person	Comments
<p>CSP 1: Role of the police</p> <p>The police will protect life, property, liberty and security of the person.</p>	<p>Lack of awareness of specific crimes that affect women, men and girls and boys; lack of sensitivity to women's vulnerability to GBV.</p> <p>Further victimisation</p> <p>Persistent gender bias due to social norms and internal predisposition</p>	<p>Could undermine implementation of CSP, regional human rights framework, international law systems and existing policies.</p> <p>Further undermines public trust and lowers cooperation with the community; increases the potential for revictimisation, i.e. further trauma and harm to victims/survivors.</p>	<ul style="list-style-type: none"> • Have you partnered with gender experts to undertake an annual gender audit? This audit can include surveys/a perception study of UPF members and their awareness and understanding of specific crimes that affect women, men and boys and girls (with the focus on gendered differences). • Drawing from the results of the audit, previous studies and this risk assessment, have you organised regular (compulsory) awareness-raising and training sessions on gender equality and women's rights for all members of the UPF? Have you ensured that training on gender equality encompasses training on broader gendered differences and intersectional vulnerabilities? • Have you created incentives to undergo training? For example, is training linked to advancement/promotion or special assignments within the police? • Have you introduced some form of assessment to measure effectiveness/awareness of training? Have the results of these tests been linked to performance measurement/performance indicators? • Are all police officers trained to deal with GBV without bias, conscious of the dangers of revictimisation and respectful of privacy? • Are all police officers trained to identify the needs of victims and to direct them to the appropriate services? • Does the organisation have tailored protocols on responding to gendered crimes (such as domestic violence) that provide operational independence for officers to tailor guidance to particular contexts? • Do these protocols prioritise victim/survivor well-being and address diverse needs, regardless of background or legal status? • Has leadership consulted with representatives from vulnerable groups, such as minority and underrepresented women's organisations, and leaders from minority ethnic communities? (This helps build relationships and understanding while fostering trust.) 			

	Identified risks/hazards	Impact	Control/mitigation measure/options	YES/ NO	Owner/ responsible party/person	Comments
CSP 2: Policing in accordance with the rule of law	Social norms and internalised bias lead to discrimination.	<p>Could undermine implementation of CSP, regional human rights framework, international law systems and existing policies.</p> <p>A failure to comply with the rule of law can further result in exacerbating marginalisation experienced by vulnerable groups, including women.</p>	<ul style="list-style-type: none"> • Have you identified, in a participatory manner, the social norms and behaviours that most facilitate discrimination, harassment and/or gender-based misconduct within the police force and by police officers? • Have you developed a strategy and plan to address this – including by introducing new norms, role models, new performance indices, awareness plans, etc.? • Have you developed an effective communication plan, both internally and externally? • Have you established an effective feedback mechanism to allow members of the public and female UPF members to report any form of discrimination, harassment or gender-based misconduct within the police force and by police officers? • Are there services in place for those UPF members that require support (such as counselling, rights advice, etc.) after reporting any form of misconduct, harassment or discrimination? 			
CSP 3: Police actions	Social norms and internalised bias lead to discrimination.	<p>Could undermine implementation of CSP, regional human rights framework, international law systems and existing policies.</p> <p>Police actions that fail to comply with the CSP can further result in inadequate services for survivors of GBV while exacerbating marginalisation experienced by vulnerable groups, including women.</p>	<ul style="list-style-type: none"> • Have police officers received training in dignity and diversity? • Is this training measured in terms of outcomes and impact? • Are there champions (focus groups) within the police organisation to drive change and positively recognise gendered diversity? • Are these champions openly praised/recognised? • Have mechanisms been introduced to monitor this? 			

	Identified risks/hazards	Impact	Control/mitigation measure/options	YES/ NO	Owner/ responsible party/person	Comments
CSP 4: Police organisations	<ul style="list-style-type: none"> Lack of awareness of existing policies Lack of awareness of specific duties in relation to existing policies Lack of accountability for failure to comply with duties 	<p>Undermines the implementation of existing progressive policies.</p> <p>Stalls progress.</p> <p>Hinders the capacity to improve gender representation.</p>	<ul style="list-style-type: none"> Have you collaborated with gender experts (including former or existing police practitioners) to review recruitment guidelines, utilising a gender lens? Have you undertaken a gender audit of the content, course requirements and delivery of pre-entry training? Have you reviewed and improved the UPF's communication strategy and framework to ensure timely release and relaying of opportunities so that it reaches all police regions in the country in a transparent and comprehensive manner? Has the use of social media been supported with formal communication channels? Have you undertaken a gendered audit/review of the orientation programme for new recruits? Have you utilised gender experts to review how existing policies are introduced and explained, while introducing some form of assessment to ensure that officers understand the relevant provisions of existing policies? What are the accountability mechanisms to achieve gender equality results? Do police officers feel they are accountable for reporting results on gender-related objectives? Are these accountability mechanisms translated and enforced from the levels of top leadership throughout the organisation? What steps are being undertaken to ensure that the police service is a safe place for women to work; is free from sexual harassment, violence, discrimination; and that there are confidential reporting mechanisms that are trusted across the UPF? Have you taken steps to ensure that the 30% quota is implemented in each district/region? Have you organised regular training sessions on the internal policies, while emphasising the specific duties of particular staff members so everyone is aware of what is expected of them? Are there clear (and publicised) ramifications for neglecting these duties? Is there a specific budget for activities designed to achieve gender equality? Have you provided women with a role in decision making? 			

Identified risks/hazards	Impact	Control/mitigation measure/options	YES/ NO	Owner/ responsible party/person	Comments
		<ul style="list-style-type: none"> • Have you reduced the gap between women and men police officers in terms of opportunities, the potential for retentions, promotions and authority? • Have you addressed the needs of new mothers (adopted retention policies focused on maternity leave/caregiving duties)? • Have you created mentoring and coaching opportunities? • Have you promoted women's health and well-being through, for example, providing flexible work opportunities. Flexible working possibilities might include part-time, job sharing (where more than one person shares a single post), and agile workers (where people can work from any location). • Do you conduct exit interviews with female officers that choose to leave the organisation to ascertain their reason for leaving? • Have you adopted gender-blind promotional processes (in which assessors do not know the applicants' gender), affirmative action,⁶⁹ and supportive working environments (including flexible working arrangements) to encourage women and other underrepresented groups to join and remain in the UPF? • Is there a dedicated action plan steering committee/project management team that meets regularly, reviews and monitors its implementation and achievement against the plan, and reports to senior leadership? • Have you ensured that the police organisation (the physical building/office) is designed in a gender-responsive manner? For example, have you ensured that there is adequate lighting throughout the building and surrounding areas? • Have you reviewed the design of the building to ensure it is accessible for people living with disabilities, the elderly and children? • Have you considered child-care facilities and breastfeeding rooms? • Are latrines gender-segregated, private, clean and secure? • Have you ensured that there are menstrual-hygiene management provisions for women? 			

CONCLUSION

It is clear that while the UPF has a number of progressive internal policies and practices in place, there is a need to bolster implementation measures. It is also clear that any measures that are introduced need to be responsive to the existing socio-economic, political and legal framework that shapes gender inequality in Uganda. While the police are not responsible for solving the challenges of gender inequality on their own, they can and must play a key role in owning the problem of GBV, challenging gender stereotypes and taking steps to empower women. Ultimately, the proposed methodology seeks to promote an inclusive and nuanced approach to examining and responding to gendered risks for the UPF, through recognising the importance of gender as a cross-cutting factor in policing. The proposed gendered analysis and risk assessment can assist the UPF in effectively responding to the identified threats and vulnerabilities relating to fostering gender-responsive policing and provide recommendations for measures to address these challenges. This can serve to protect the UPF's reputation as well as its financial resources, while fostering gender-sensitive policing, improving services, enhancing resiliency and ensuring compliance with existing gendered human rights commitments.

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ABOUT APCOF

The African Policing Civilian Oversight Forum (APCOF) is a Not-for-Profit Trust working on issues of police accountability and governance in Africa. APCOF promotes the values which the establishment of civilian oversight seeks to achieve; namely to assist in restoring public confidence, developing a culture of human rights, promoting integrity and transparency within the police, and nurturing good working relationships between the police and the community. While APCOF is active in the field of policing, its work is located in the broader paradigm of promoting democratic governance and the rule of law.

ABOUT RWI

The Raoul Wallenberg Institute of Human Rights and Humanitarian Law (RWI) is an independent academic institution established at Lund University in Sweden in 1984. For more than 30 years, RWI has worked to promote human rights by means of education, research and institutional development through cooperation with primarily government, academic and national human rights institutions in Europe, Africa, Asia, the Middle East and Latin America. RWI implements a wide range of human rights capacity development programmes internationally that seek to advance lasting change when it comes to the practical application of human rights through long-term, constructive cooperation with individuals, groups, institutions and organisations to maintain and strengthen abilities to define and achieve mutual human rights objectives, and through a process itself guided by human rights.

ABOUT THIS REPORT

The paper discusses the contextual risks and vulnerabilities undermining compliance with the UPF's gendered commitments. It seeks to understand the underlying causes and drivers contributing to these risks and inform measures aimed at fostering gender equality within all levels of the UPF.

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