

Comparative Analyses of Policing Reforms in African States Facing Similar Security Challenges

Chioma Shalom Uzoigwe

Department of Criminology and Security Studies

National Open University of Nigeria, P.M.B. 80067, Victoria Island; Lagos; Nigeria.

Email: chiomashalowuzoigwe@gmail.com | Phone: 2347032815472

doi: <https://doi.org/10.37745/gjplr.2013/vol14n3117>

Published May 02, 2026

Citation: Uzoigwe C.S. (2026) Comparative Analyses of Policing Reforms in African States Facing Similar Security Challenges, Global Journal of Politics and Law Research, 14(3),1-17

Abstract: *This article conducts a comparative analysis of police reforms across multiple African states confronting security challenges analogous to those in Nigeria, including terrorism, organized crime, communal violence, and public distrust in law enforcement institutions. Drawing on empirical studies from Kenya, South Africa, Ghana, Namibia, Tanzania, The Gambia, and comparative analyses of West and Southern African states, this article synthesizes evidence on reform trajectories, their effectiveness, and the lessons they offer for Nigeria and other African nations facing hybrid security threats. The findings indicate that successful reforms typically integrate four dimensions: legal and constitutional frameworks defining police mandates; technological modernization enhancing operational effectiveness; personnel reforms addressing recruitment, training, and remuneration; and accountability mechanisms—particularly independent oversight bodies—that rebuild public trust. The article identifies a recurring tension between the legal concentration of security authority in state police forces and the operational reality that non-state actors continue to play significant roles in security provision across the continent. The study concludes that sustainable security sector reform requires context-sensitive approaches that acknowledge hybrid security governance while strengthening accountability and legal frameworks.*

Keywords: police reform, security sector reform, Africa, comparative analysis, community policing, police oversight, hybrid security governance

INTRODUCTION

Across Africa, states confront a complex and evolving security landscape characterized by terrorism, communal violence, organized crime, and persistent public distrust of law enforcement institutions (Nda-Yakubu, 2025). While Nigeria's security challenges—including banditry, kidnapping, farmer-herder conflicts, and Boko Haram insurgency—are well-documented, many

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African states face analogous threats that have prompted significant police reform initiatives over the past decade (Amoo, 2025; Ajibade et al., 2025).

The imperative for police reform across Africa is rooted in a shared colonial legacy, where policing was historically oriented toward regime protection and repression rather than public service (Nda-Yakubu, 2025). Post-independence, many African states inherited policing models ill-suited to democratic governance, characterized by centralization, politicization, and weak accountability mechanisms. In recent years, a wave of reform efforts has sought to transform policing into a professional, accountable, and community-oriented institution (Mudale & Mwea, 2024; Ong'ale et al., 2025).

Statement of the Problem

While individual country studies on police reform in Africa exist, there is a significant gap in comparative research that systematically examines reform trajectories across multiple African states facing similar security challenges. Specifically:

Limited cross-national synthesis: Although countries such as Kenya, South Africa, Ghana, Namibia, and The Gambia have implemented police reforms over the past decade, no comprehensive comparative analysis has synthesized their reform trajectories, outcomes, and lessons for Nigeria (Amoo, 2025).

Underexplored accountability mechanisms: While independent police oversight bodies have been established in several African states, comparative research on their effectiveness, challenges, and transferability remains limited, particularly for the Nigerian context (Independent Policing Oversight Authority, 2026).

Hybrid security governance gap: Despite growing recognition that non-state actors play significant roles in African security provision, there is limited comparative research on how police reforms have engaged with—or failed to engage with—hybrid security governance arrangements (Nda-Yakubu, 2025).

Context-specific reform knowledge deficit: Existing literature largely treats police reform as a technical exercise, with insufficient attention to how constitutional frameworks, political contexts, and historical legacies shape reform outcomes across different African states (Amoo, 2025).

Justification for the Research

This study is justified on several compelling grounds:

First, the urgency of Nigeria's security crisis. The Nigeria Security Tracker (NST) reported over 8,000 deaths from farmer-herder conflicts between 2019 and 2024, while kidnapping incidents increased by 45% during the same period (cited in Ajibade et al., 2025). The police-to-citizen ratio in Nigeria (approximately 1:500) falls far below the United Nations recommended ratio of 1:220. Recent research comparing public perceptions of the Nigeria Police Force (NPF) and Amotekun found that while only 47% of respondents rated the NPF as "rather effective," 86% trusted Amotekun "mostly or completely" (Ajibade et al., 2025). These findings indicate a crisis of legitimacy that requires urgent policy attention.

Second, the gap between legal frameworks and operational realities. Comparative constitutional research by Amoo (2025) comparing police mandates across eleven countries—including Brazil, the Philippines, Scotland, Kenya, Tunisia, Ghana, South Africa, Zambia, Mozambique, and Namibia—found "critical similarities and differences in the constitutional police mandate." Critically, in Ghana, South Africa, and Namibia, constitutions do not provide explicit provisions for other stakeholders to be involved in preserving internal security. Namibia's experience is particularly instructive: while its Constitution formally restricts internal security preservation to the police alone, the military "remains consistently engaged in this role due to internal security challenges that cannot be addressed by the police alone" (Amoo, 2025, p. 1035). This gap between legal mandate and operational necessity has prompted recommendations for constitutional amendment, a lesson directly applicable to Nigeria.

Third, the accountability imperative. Research from Kenya demonstrates that the Independent Policing Oversight Authority (IPOA) receives hundreds of complaints annually, ranging from deaths in custody to excessive use of force (Independent Policing Oversight Authority, 2026). As IPOA articulates, "demanding accountability is not anti-policing. It is pro-democracy, pro-profession" (2026, para. 4). The Gambia's recent debate over establishing an independent police oversight body similarly emphasizes that "trust in the police is the foundation of public order. Without it, citizens withdraw cooperation, suspicion festers, and law enforcement loses legitimacy" (The Standard Newspaper, 2025, para. 2). Yet no independent police oversight body has been established in Nigeria, representing a critical gap in the country's security architecture.

Fourth, the technology-personnel synergy. Recent quantitative research in Kenya by Ong'ale et al. (2025) found that personnel reforms independently influence police performance ($\beta=0.429$, $p=0.000$), but this effect is significantly enhanced when complemented by technological reforms ($\beta=0.245$, $p=0.000$). This interaction effect demonstrates that reforms are not additive but synergistic—technology amplifies the impact of personnel reforms, and vice versa. This finding

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has significant implications for resource allocation in reform programs across Africa, yet no comparable research exists for Nigeria.

Fifth, documented reform effectiveness gaps. Mudale and Mwea (2024) found that while community policing initiatives in Kenya produced "positive outcomes, including improved community relations, strengthened accountability, and technological advancements in policing," persistent challenges including "incomplete implementation, public skepticism, and external socioeconomic factors" limit the full realization of reforms. Understanding these implementation gaps across multiple African states provides valuable lessons for avoiding similar pitfalls in Nigeria.

Sixth, the urgency for evidence-based policymaking. As African states face escalating security threats, the cost of policy failure is measured in human lives, displaced populations, and eroded state legitimacy. South Africa's Deputy President Mashatle recently outlined comprehensive anti-corruption measures for the South African Police Service (SAPS), including an Anti-Corruption Task Team that has recovered more than R11 billion (African News Agency, 2026). Yet the Madlanga Commission continues to reveal "prima facie wrongdoing" indicating that "controls still need strengthening" (African News Agency, 2026, para. 5). Learning from both successes and failures across African states is imperative for designing effective reforms.

Research Gap and Contribution

This article addresses the following specific gaps in the existing literature:

Gap 1: Absence of comparative synthesis. While individual country studies exist, there is no comprehensive comparative analysis of police reform across African states that explicitly addresses Nigeria's unique security context.

Gap 2: Limited attention to constitutional frameworks. Comparative constitutional analysis of police mandates across African states is underdeveloped, particularly regarding provisions for multi-stakeholder involvement in security governance (Amoo, 2025).

Gap 3: Underexplored accountability mechanisms. The role and effectiveness of independent police oversight bodies in African contexts remain insufficiently researched, especially regarding transferability to Nigeria.

Gap 4: Neglect of hybrid security governance. Most police reform literature focuses on formal state institutions, with inadequate attention to how non-state actors and hybrid arrangements shape security provision (Nda-Yakubu, 2025).

Gap 5: Limited synthesis of empirical findings. Quantitative findings on reform effectiveness—including synergistic effects between technological and personnel reforms—have not been systematically synthesized for policy application across African states.

Aim and Objectives

Aim: To conduct a comparative analysis of police reforms across African states facing security challenges similar to Nigeria, identifying transferable insights for security sector reform.

Objectives:

1. To analyze reform trajectories in Kenya, South Africa, Ghana, Namibia, The Gambia, Tanzania, Zambia, and Mozambique.
2. To identify dimensions of successful reform: legal, technological, personnel, and accountability mechanisms.
3. To examine how constitutional frameworks shape police effectiveness and stakeholder involvement.
4. To analyze the role of non-state actors in hybrid security governance across African states.
5. To synthesize lessons and develop evidence-based recommendations for Nigeria and other African states.

Research Questions

1. What police reform dimensions have proven effective across African states facing security challenges analogous to Nigeria?
2. How do constitutional frameworks shape police effectiveness and multi-stakeholder involvement in security governance?
3. What is the role of independent oversight bodies in rebuilding public trust, and what lessons do they offer for Nigeria?
4. How do personnel and technological reforms interact, and what are the implications for reform sequencing?
5. How can police reforms acknowledge and integrate hybrid security governance rather than ignoring non-state actors?

Significance and Contributions

This article makes several significant contributions:

Theoretical Contributions:

1. Integrates democratic policing theory, hybrid security governance, and institutional legitimacy theory into a unified analytical framework for comparative police reform analysis.
2. Develops a multi-dimensional model of police reform effectiveness applicable across African contexts.
3. Advances understanding of technology-personnel synergy in police reform through synthesis of empirical evidence.

Empirical Contributions:

1. Provides the first comprehensive comparative analysis of police reforms across African states explicitly contextualized for Nigeria.
2. Synthesizes recent empirical findings on reform effectiveness, including quantitative evidence from Kenya (Ong'ale et al., 2025; Mudale & Mwea, 2024) and South Africa (African News Agency, 2026).
3. Documents constitutional provisions for police mandates across eleven countries (Amoo, 2025).

Policy Contributions:

1. Offers evidence-based recommendations for constitutional reform to enable multi-stakeholder security governance.
2. Provides actionable guidance for establishing independent police oversight bodies modeled on Kenya's IPOA and Gambian proposals.
3. Develops a framework for integrating non-state actors into formal security governance while ensuring accountability.
4. Informs resource allocation decisions based on demonstrated synergy between technological and personnel reforms.

Methodological Contributions:

1. Demonstrates the value of comparative case study methodology for security sector reform research in African contexts.
2. Establishes a replicable analytical framework for assessing police reform effectiveness across multiple dimensions.

Scope and Delimitation

This study is limited to:

- Eight African states: Kenya, South Africa, Ghana, Namibia, The Gambia, Tanzania, Zambia, and Mozambique, selected based on documented reform experiences.
- Comparative case study design synthesizing existing empirical research published between 2019 and 2026.
- Analysis limited to police reforms; broader security sector reform (military, intelligence, judiciary) is excluded.

Operational Definition of Terms

Table 1.1: Definition of Terms

Term	Definition
Police reform	Deliberate institutional changes to improve police effectiveness, accountability, and public trust
Security sector reform	Broader transformation of security institutions (police, military, intelligence, judiciary) to enhance democratic governance
Hybrid security governance	Co-production of security by state and non-state actors operating within complex institutional arrangements

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Term	Definition
Independent oversight body	Civilian-led institution empowered to investigate police misconduct and recommend sanctions
Community policing	Collaborative approach where police and communities work together to prevent crime
Democratic policing	Policing model where authority derives from public consent, accountability, and human rights protection

THEORETICAL FRAMEWORK

This study is anchored in three complementary theoretical perspectives that illuminate different dimensions of police reform.

Democratic Policing Theory

Democratic policing theory posits that legitimate policing requires a legal framework that defines police powers, accountability mechanisms that ensure oversight, and operational practices that respect human rights (Nda-Yakubu, 2025). Central to this framework is the recognition that police authority derives from public consent rather than coercive capacity. As articulated in the Kenyan context, accountability is not hostile to policing but "its greatest ally"—strengthening legitimacy, professionalism, and public trust (Independent Policing Oversight Authority, 2026).

Hybrid Security Governance

Hybrid security governance recognizes that in many African states, security is co-produced by state and non-state actors operating within complex, often ambiguous, institutional arrangements (Nda-Yakubu, 2025). This framework moves beyond binary distinctions between "formal" and "informal" security provision to examine how different actors negotiate authority, share responsibilities, and compete for legitimacy. The framework is particularly relevant for understanding the persistence of vigilante groups, community policing initiatives, and private security arrangements alongside formal police forces across Africa.

Institutional Legitimacy Theory

Institutional legitimacy theory, as developed by Tom Tyler and others, posits that public compliance with the law and cooperation with law enforcement depend more on perceived legitimacy—trust in the fairness and procedural justice of institutions—than on deterrent threats (Ajibade et al., 2025). Reforms that enhance accountability, transparency, and fair treatment of citizens therefore strengthen police effectiveness not merely by improving capacity but by rebuilding the social contract between police and communities.

METHODOLOGY

Research Design

This study employs a comparative case study design, analyzing policing reform initiatives across multiple African states. The research synthesizes findings from peer-reviewed studies, government reports, and institutional publications published between 2019 and 2026.

Case Selection

Table 2: The following states were selected for analysis based on their experience with police reforms addressing security challenges analogous to those in Nigeria:

State	Security Challenge	Reform Focus
Kenya	Terrorism, organized crime, police misconduct	Community policing, technological reforms, oversight mechanisms
South Africa	Violent crime, corruption, public distrust	Anti-corruption measures, specialized units, accountability
Ghana	Crime, public trust deficits	Legal framework, community engagement
Namibia	Internal security, constitutional mandate	Constitutional reform, stakeholder involvement

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State	Security Challenge	Reform Focus
The Gambia	Police misconduct, trust deficits	Independent oversight bodies
Tanzania	Cross-border crime, regional security	Regional cooperation frameworks
Zambia	Crime, constitutional mandate	Multi-stakeholder security provisions
Mozambique	Organized crime, insurgent threats	Constitutional security mandates

Data Sources

Primary sources include peer-reviewed journal articles, government reports, institutional publications (SOAS, Kenyatta University, FUYOYE), and legislative documents. Secondary sources include policy analyses and comparative studies of African policing. All sources are cited with publication dates between 2019 and 2026 to ensure currency.

Analytical Framework

Table 3: Table Reform effectiveness is assessed across five dimensions derived from the integrated reform dimensions identified in the literature:

Dimension	Indicators	Data Sources
Legal/constitutional	Clear police mandates, accountability provisions, stakeholder involvement	Amoo (2025); Nda-Yakubu (2025)
Technological	Digital forensics, surveillance, data analytics	Ong'ale et al. (2025); Mudale & Mwea (2024)

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Dimension	Indicators	Data Sources
Personnel	Fair recruitment, training, remuneration, deployment	Ong'ale et al. (2025)
Accountability	Independent oversight, whistleblower protection, civilian review	IPOA (2026); The Standard Newspaper (2025)
Hybrid governance	Integration of non-state actors, community trust	Ajibade et al. (2025); Nda-Yakubu (2025)

COMPARATIVE ANALYSIS OF POLICE REFORMS

Kenya: A Multi-Dimensional Reform Approach

Kenya has undertaken one of Africa's most comprehensive police reform efforts, driven by constitutional change following the 2010 Constitution and the post-election violence of 2007-2008.

Constitutional and Legal Framework. Article 244 of Kenya's 2010 Constitution explicitly mandates a police service that is "professional, disciplined, and accountable to the people it serves." The National Police Service Act (2011) and the Independent Policing Oversight Authority (IPOA) Act (2011) established institutional frameworks for accountability.

Accountability Mechanisms. Kenya's IPOA represents a significant innovation in African police governance. As a civilian-led body empowered to investigate police misconduct, compel witness testimony, access records, and publish findings, IPOA embodies the principle that "no institution can credibly police itself when accused of wrongdoing" (Independent Policing Oversight Authority, 2026). Between January and June 2024, hundreds of complaints continued to be lodged by the public, with many involving serious injuries, deaths, or abuse of authority.

Personnel and Technological Reforms. Ong'ale et al. (2025) found that personnel reforms independently influence DCI performance ($\beta=0.429$, $p=0.000$), but this effect is significantly enhanced when complemented by technological reforms ($\beta=0.245$, $p=0.000$). This interaction effect demonstrates that technology amplifies the impact of personnel reforms.

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Community Policing. Mudale and Mwea (2024) found that community policing initiatives have produced "positive outcomes, including improved community relations, strengthened accountability, and technological advancements in policing." However, challenges of incomplete implementation and public skepticism persist.

South Africa: Anti-Corruption and Accountability Measures

South Africa's police reform efforts have focused intensively on combating corruption and strengthening accountability.

Anti-Corruption Framework. Deputy President Mashatile outlined comprehensive measures including the Anti-Corruption Task Team, which has recovered more than R11 billion, and an integrated technology-driven case management system (African News Agency, 2026).

Accountability Mechanisms. SAPS has enhanced whistleblower protection through National Instruction 18 of 2019 on Integrity Management. Internal vetting includes lifestyle reviews, financial disclosure, and reactive lifestyle audits.

Operational Reforms. Specialized units include the Anti-Gang Unit and Economic Infrastructure Task Force. However, the Madlanga Commission continues to reveal "prima facie wrongdoing," indicating controls still need strengthening.

Ghana: Legal Framework and Community Engagement

Ghana's Constitution does not provide explicit provisions for other stakeholders to be involved in preserving internal security—assigning this responsibility solely to the police. This legal concentration contrasts with Kenya, Zambia, and Mozambique, where constitutions mandate multi-stakeholder involvement (Amoo, 2025).

Namibia: Constitutional Reform and Internal Security

Namibia presents a critical case where constitutional provisions and operational realities diverge. While Namibia's Constitution formally restricts internal security preservation to the police alone, the military "remains consistently engaged in this role due to internal security challenges that cannot be addressed by the police alone" (Amoo, 2025, p. 1035). This gap has prompted recommendations for constitutional amendment.

The Gambia: Independent Police Oversight

The Gambia's debate over establishing an independent police oversight body illustrates the critical role of accountability. As one analysis notes, "Trust in the police is the foundation of public order.

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Without it, citizens withdraw cooperation, suspicion festers, and law enforcement loses legitimacy" (The Standard Newspaper, 2025, para. 2). Civilian-led commissions, legal enshrinement of powers, and political will are identified as essential.

Tanzania, Zambia, Mozambique: Regional Comparisons

In Brazil, the Philippines, Scotland, Kenya, Zambia, and Mozambique, constitutions mandate either the armed forces or civilian components to aid the national police in preserving internal security (Amoo, 2025). This multi-stakeholder approach offers greater flexibility in responding to complex security threats.

HYBRID SECURITY GOVERNANCE: THE ROLE OF NON-STATE ACTORS

Nda-Yakubu's (2025) comparative study examines how "corruption, weak institutions, and insufficient resources have predominantly contributed to the rise and continued reliance on non-state actors." Key findings include:

- Hybrid security governance is a defining feature of African security landscapes
- A multi-scalar approach provides valuable strategies for improving security
- Historical continuity reveals persistent patterns of hybrid arrangements

For Nigeria specifically, Ajibade et al. (2025) compared public perceptions of the NPF and Amotekun, finding that 86% of respondents trusted Amotekun "mostly or completely" compared to only 47% rating the NPF as "rather effective." Trust deficits in the NPF were attributed to corruption (30%) and unprofessionalism (29%).

SYNTHESIS: LESSONS FOR NIGERIA AND OTHER AFRICAN STATES

Integrated Reform Dimensions

Table 4: Integrated Reform Dimensions

Across case studies, successful reforms consistently integrate four dimensions:

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Reform Dimension	Key Elements	Evidence from Cases
Legal/Constitutional	Clear police mandates, accountability provisions, stakeholder involvement	Kenya (2010 Constitution), Namibia (proposed amendments)
Technological	Digital forensics, surveillance, data analytics, case management systems	Kenya (DCI reforms), South Africa (integrated case management)
Personnel	Fair recruitment, training, remuneration, deployment	Kenya (competitive recruitment), South Africa (vetting, lifestyle audits)
Accountability	Independent oversight, whistleblower protection, civilian review	Kenya (IPOA), The Gambia (proposed), South Africa (IPID)

The Accountability Imperative

Across all case studies, independent oversight emerges as a non-negotiable element of sustainable police reform. As articulated in the Kenyan context, "demanding accountability is not anti-policing. It is pro-democracy, pro-profession" (Independent Policing Oversight Authority, 2026).

Constitutional Alignment

Countries where constitutions explicitly authorize multi-stakeholder involvement in security provision may be better equipped to address complex threats. Namibia's experience suggests that legal frameworks must evolve to address contemporary challenges.

Technology-Personnel Synergy

The interaction effect ($\beta=0.245$, $p=0.000$) from Kenyan research demonstrates that technological and personnel reforms produce synergistic effects (Ong'ale et al., 2025). This has significant implications for resource allocation.

Acknowledging Hybrid Governance

The higher public trust in Amotekun (86%) compared to the Nigeria Police Force suggests that community-based initiatives can fill critical gaps in security provision (Ajibade et al., 2025). Sustainable reform should integrate these initiatives into formal frameworks.

CHALLENGES AND LIMITATIONS

Implementation Gaps

In Kenya, challenges include "incomplete implementation, public skepticism, and external socioeconomic factors" (Mudale & Mwea, 2024). In South Africa, despite extensive measures, the Madlanga Commission continues to reveal "prima facie wrongdoing" (African News Agency, 2026).

Resource Constraints

The Independent Policing Oversight Authority in Kenya faces "limited resources" constraining its investigative capacity (Independent Policing Oversight Authority, 2026). Across Africa, community policing initiatives struggle with funding deficits.

Political Interference

Political interference in police operations and reform implementation remains a significant challenge across case studies.

Measuring Effectiveness

Attributing changes in crime rates or public trust to specific reforms is complicated by concurrent social and economic factors.

RECOMMENDATIONS

For Nigeria

1. **Constitutional and Legal Framework:** Clarify the legal status of community-based security initiatives like Amotekun, drawing on Kenya's constitutional provisions for multi-stakeholder security governance.
2. **Independent Oversight:** Establish a civilian-led police oversight body with powers to investigate misconduct, compel testimony, and publish findings, modeled on Kenya's IPOA.

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3. **Integrated Reform Approach:** Simultaneously pursue personnel reforms and technological modernization, recognizing their synergistic effects ($\beta=0.245$, $p=0.000$).
4. **Community Engagement:** Build on the relative public trust in Amotekun (86%) to develop community policing models that leverage local knowledge while ensuring accountability.

For African Policymakers

1. **Constitutional Alignment:** Review constitutional provisions to ensure legal frameworks align with operational realities for multi-stakeholder involvement.
2. **Accountability Investment:** Allocate adequate resources to independent oversight bodies as an investment in police legitimacy.
3. **Context-Sensitive Reform:** Acknowledge hybrid security governance rather than imposing foreign models uncritically.

For Development Partners

1. **Long-term Commitment:** Support police reform as a long-term institutional development process.
2. **Holistic Support:** Provide resources for the full spectrum of reform dimensions—legal, technological, personnel, and accountability.
3. **Civil Society Engagement:** Support civil society in monitoring reform implementation.

CONCLUSION

This comparative analysis of police reforms across African states reveals both common patterns and context-specific variations. Successful reform trajectories integrate four dimensions: legal and constitutional frameworks, technological modernization, personnel reforms, and accountability mechanisms.

The evidence indicates that independent oversight is not a threat to police effectiveness but a prerequisite for legitimacy and public trust. The constitutional comparative analysis reveals important variations in legal frameworks for security governance. The persistence of hybrid security governance requires acknowledgment rather than dismissal.

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For Nigeria, the relatively higher public trust in Amotekun (86%) compared to the Nigeria Police Force suggests that community-based initiatives can fill critical gaps in security provision. However, legal ambiguity, inadequate resourcing, and accountability gaps must be addressed.

Ultimately, police reform in Africa is not merely a technical exercise in institutional capacity-building but a political project of renegotiating the social contract between states and citizens.

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