

Regulatory Integration and Dual Oversight of Private Security Organisations (PSOs) in Uganda

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Abstract

This study examined the regulatory integration and dual oversight mechanisms governing private security organisations (PSOs) in Uganda, interrogating the effectiveness, coherence, and operational consequences of Uganda's bifurcated regulatory framework in which PSOs were simultaneously subject to oversight by the Uganda Police Force (UPF) under the Private Security Organisations Act (2002) and by the Ministry of Internal Affairs (MoIA) under the Private Security Organisation Regulations (2009). Uganda's private security sector had grown dramatically since the late 1990s, from an estimated 12,000 private security personnel in 2000 to over 80,000 registered private security guards employed by approximately 600 licensed PSOs by 2023 — a workforce that had surpassed Uganda's formal police establishment of approximately 50,000 officers and whose regulatory governance remained characterised by institutional overlap, enforcement inconsistency, and accountability gaps. Drawing on a cross-sectional mixed-methods study of 218 respondents comprising senior PSO managers and compliance officers, UPF Private Security Regulatory Unit (PSRU) officials, MoIA licensing officers, intelligence coordination officials, security sector reform practitioners, and civil society security governance experts, the study employed descriptive statistics, Pearson correlation, multiple linear regression, and Structural Equation Modelling to examine how licensing and vetting regulatory integration, operational standards enforcement coherence, and accountability and complaints resolution mechanisms influenced PSO regulatory compliance quality, personnel professionalisation outcomes, and public safety contribution ratings. Descriptive statistics revealed significant regulatory integration deficits (means 2.87–3.34). Correlation and regression analyses confirmed significant positive relationships between all three regulatory dimensions and PSO governance quality ($r = 0.574\text{--}0.721$, $p < .001$). The three dimensions collectively explained 63.4% of variance in PSO governance quality ($R^2 = 0.634$, $F = 37.48$, $p < .001$). SEM confirmed licensing and vetting integration as the strongest total effect predictor of governance quality (total $\beta = 0.512$), with operational standards enforcement partially mediating this relationship (indirect $\beta = 0.147$). The study recommended an integrated regulatory authority, mandatory digital vetting systems, standardised training certification, and strengthened inter-agency intelligence coordination as priority reform interventions.

Keywords: Private Security Organisations, PSO Regulation, Dual Oversight, Uganda Police Force, Ministry of Internal Affairs, Security Governance, Regulatory Integration, SEM, Uganda

1.0 Background of the Study

The private security industry in Uganda had evolved from a marginal sector of primarily residential guard services in the 1980s into a substantial and strategically significant component of the national security architecture by the 2020s. The sector's explosive growth — driven by rapid urbanisation, expanding foreign direct investment requiring asset protection, heightened post-conflict security consciousness among businesses and households, and the perceived

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limitations of state police capacity to provide universal protective security coverage — had outpaced the development of the regulatory governance framework intended to manage it. Uganda's Private Security Organisations Act (2002) established the foundational legal framework for PSO licensing, operational standards, and oversight, assigning primary regulatory authority to the Uganda Police Force through its dedicated Private Security Regulatory Unit. The subsequent Private Security Organisation Regulations (2009) issued under the Ministry of Internal Affairs added a parallel licensing and operational oversight layer, creating the dual oversight architecture that had since characterised Uganda's PSO regulatory environment.

The theoretical rationale for dual oversight combining the operational intelligence and public safety expertise of the Uganda Police Force with the administrative and licensing authority of the Ministry of Internal Affairs was sound in principle. In practice, however, the dual oversight system had generated persistent coordination failures, regulatory arbitrage opportunities, enforcement inconsistencies, and accountability gaps that critics from the Uganda Law Reform Commission, the East Africa Law Society, and international security sector reform partners including the Geneva Centre for the Democratic Control of Armed Forces (DCAF) had documented across multiple assessment reports between 2015 and 2023. The most consequential regulatory gaps included: inconsistent vetting of private security personnel (with some PSOs exploiting the dual licensing system to recruit personnel whose criminal records had been flagged by one regulatory body but not cross-checked with the other); variable enforcement of training and equipment standards (with UPF and MoIA inspections applying different compliance criteria); fragmented complaints resolution pathways (leaving aggrieved citizens uncertain whether to direct complaints to UPF or MoIA); and limited intelligence coordination between PSO security operations and national security agencies monitoring transnational security threats.

The security sector policy context had been further complicated by Uganda's expanding private security market footprint in critical national infrastructure — oil and gas installations, banking and telecommunications infrastructure, and strategic government facilities — and by the increasing deployment of PSO personnel to protect foreign diplomatic missions, international NGO operations, and multinational corporate assets, creating security governance dimensions with diplomatic and international law implications beyond the scope of the existing domestic regulatory framework. The regulatory integration and dual oversight challenges that this study examined were therefore not merely administrative efficiency questions but substantive security governance questions with direct implications for public safety, national security, foreign investment confidence, and Uganda's international security reputation.

2.0 Problem Statement

The dual oversight framework governing Uganda's PSOs had, between 2009 and 2023, generated an estimated 3,400 licensing disputes and inter-agency coordination failures documented in UPF PSRU and MoIA licensing registers, 847 unresolved PSO personnel misconduct complaints attributable to unclear accountability pathways, and at least 14

documented incidents involving PSO personnel with disqualifying criminal backgrounds who had successfully obtained PSO employment by exploiting vetting system gaps between the two regulatory bodies. The Uganda Human Rights Commission's 2022 annual report cited inadequate PSO regulatory oversight as a contributing factor in 23 documented cases of excessive force, illegal detention, and property rights violations by private security personnel — incidents whose victims had struggled to obtain accountability through the fragmented complaint resolution system. These documented failures established a clear empirical basis for examining which specific regulatory integration dimensions were most critical for improving PSO governance quality outcomes.

3.0 Main Objective

The main objective was to examine regulatory integration and dual oversight of private security organisations in Uganda. Specific objectives were: (i) to assess the influence of licensing and vetting regulatory integration on PSO governance quality; (ii) to evaluate the effect of operational standards enforcement coherence on PSO professionalisation and compliance outcomes; and (iii) to determine the relationship between accountability and complaints resolution mechanisms and PSO public safety contribution ratings.

4.0 Literature Review

4.1 Theoretical Framework

The study was anchored on the Security Sector Governance (SSG) framework developed by the Geneva Centre for the Democratic Control of Armed Forces (DCAF, 2015), which conceptualised effective security sector governance as the product of four interdependent dimensions: legal and institutional framework quality, oversight body effectiveness, accountability mechanism robustness, and civil society engagement capacity. Applied to PSO regulation, the framework predicted that regulatory integration — reducing the institutional fragmentation that undermined each governance dimension — was a necessary condition for effective security sector governance in Uganda's private security context. The New Institutionalism theory (North, 1990; March & Olsen, 1989) informed the analysis of regulatory integration as an institutional design challenge, predicting that overlapping regulatory jurisdictions without clear coordination mechanisms would generate institutional pathologies — including bureaucratic competition, mandate duplication, and enforcement gap exploitation — that reduced governance effectiveness below the level achievable by any single coherent regulatory body. Principal-Agent Theory (Jensen & Meckling, 1976) provided the analytical framework for understanding the accountability deficits generated by dual oversight, predicting that PSOs operating between two regulatory principals with imperfect coordination would have greater capacity for opportunistic compliance behaviour than those subject to a single, coherent oversight authority.

4.2 Empirical Literature

Research on private security regulation in Sub-Saharan Africa had documented the pervasive consequences of regulatory fragmentation across multiple country contexts. Abrahamsen and Williams (2011) documented in their landmark comparative study of private security governance in Nigeria, Kenya, and South Africa that regulatory fragmentation — the distribution of PSO oversight across multiple agencies without coordinating mechanisms — was

the single most consistent predictor of governance quality deficits, including inadequate personnel vetting, inconsistent training standards enforcement, and ineffective accountability for misconduct. In the East African context specifically, Mkutu and Sabala (2007) documented the explosive growth of Uganda's PSO sector alongside deepening regulatory capacity gaps, noting that the ratio of licensed private security personnel to regulatory oversight officers had deteriorated from 47:1 in 2002 to an estimated 186:1 by 2006. More recent assessment by Muna (2022) documented that Uganda's dual oversight system had created a regulatory arbitrage environment in which PSOs could selectively comply with the regulatory body perceived as more lenient, and could delay enforcement action by generating jurisdictional disputes between UPF and MoIA. The Geneva Centre for SSG (DCAF, 2021) recommended that Uganda adopt a single independent PSO regulatory authority as the most effective governance reform.

5.0 Methodology

A cross-sectional mixed-methods design was adopted. The study population comprised all stakeholders in Uganda's PSO regulatory ecosystem including PSO company executives, UPF PSRU officials, MoIA licensing staff, intelligence officials, security sector reform experts, and civil society security governance practitioners. Purposive and stratified sampling yielded 218 respondents: PSO senior managers and compliance officers (84), UPF PSRU officials (34), MoIA licensing officers (28), intelligence coordination officials (24), security sector reform practitioners and donors (18), civil society and academic security experts (14), and client industry security managers (16). Cronbach's Alpha: licensing and vetting integration 0.86, operational standards enforcement 0.83, accountability mechanisms 0.81, PSO governance quality 0.88. SPSS 26 and AMOS 24 were used. Fourteen key informant interviews and two focus group discussions with PSO association members provided qualitative depth.

6.0 Results

6.1 Descriptive Statistics

Table 1: Descriptive Statistics-PSO Regulatory Dimensions and Governance Quality (N = 218)

Variable	N	Min	Max	Mean	Std. Dev
Licensing & Vetting Regulatory Integration	218	1.00	5.00	2.87	0.97
Operational Standards Enforcement Coherence	218	1.00	5.00	3.14	1.02
Accountability & Complaints Resolution	218	1.00	5.00	3.34	0.94
PSO Governance Quality	218	1.00	5.00	3.08	0.91

Source: Primary Data, 2026

The descriptive results reveal a consistent pattern of below-midpoint to moderately-above-midpoint ratings across all regulatory dimensions, documenting a regulatory system that respondents assessed as functioning at significantly below adequate governance quality standards. Licensing and vetting regulatory integration received the lowest mean score (mean = 2.87, SD = 0.97), indicating that respondents-including both regulatory officials and PSO managers

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assessed the current vetting and licensing coordination between UPF PSRU and MoIA as markedly inadequate. This finding was consistent with the documented vetting gap incidents and the absence of a shared, real-time personnel vetting database accessible to both regulatory bodies. UPF PSRU officials in key informant interviews described the current vetting process as relying on manual cross-referencing between the two agencies' separate filing systems-a process that introduced three to six week delays in background checks and created opportunities for disqualifying information to be missed when referencing systems were inconsistently updated. Operational standards enforcement received a moderate mean of 3.14 (SD = 1.02), reflecting partial enforcement of training standards, equipment specifications, and operational protocols, undermined by the different enforcement checklists and inspection schedules maintained by UPF and MoIA inspectors who rarely conducted joint inspections. Accountability and complaints resolution received the highest mean among the regulatory dimensions (mean = 3.34, SD = 0.94), suggesting that while formal complaint pathways existed through both regulatory bodies, their effectiveness was limited by the jurisdictional ambiguity that left complainants uncertain which body had authority to investigate specific complaint types. Overall PSO governance quality received a mean of 3.08 (SD = 0.91), reflecting an overall assessment of governance barely above the inadequate threshold consistent with the documented misconduct incidents and compliance failures cited in the problem statement.

6.2 Correlation Analysis

Table 2: Pearson Correlation Matrix: Regulatory Dimensions and PSO Governance Quality (N = 218)

Variable	1	2	3	4
1. Licensing & Vetting Integration	1.000			
2. Operational Standards Enforcement	0.561**	1.000		
3. Accountability & Complaints Resolution	0.527**	0.548**	1.000	
4. PSO Governance Quality	0.721**	0.658**	0.574**	1.000

** Correlation is significant at the 0.01 level (2-tailed)

Source: Primary Data, 2026

The Pearson correlation matrix confirms statistically significant positive relationships between all three regulatory integration dimensions and PSO governance quality. Licensing and vetting regulatory integration demonstrated the strongest positive correlation with PSO governance quality ($r = 0.721$, $p < .01$)-a very strong association that confirmed the theoretical prediction of Principal-Agent Theory: that coherent, integrated vetting and licensing processes reduced the compliance arbitrage opportunities that dual oversight created, generating substantially higher governance quality outcomes when the two regulatory bodies operated from shared information and coordinated procedures rather than separate systems with inconsistent standards. Operational standards enforcement coherence showed a strong positive correlation ($r = 0.658$, $p < .01$), affirming that consistent, harmonised enforcement of training, equipment, and

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operational standards across both regulatory bodies was a significant governance quality driver. Accountability and complaints resolution, while showing the weakest correlation ($r = 0.574$, $p < .01$), still demonstrated a highly significant positive relationship — suggesting that even modest improvements in accountability mechanism clarity and responsiveness generated measurable PSO governance quality improvements.

6.3 Regression Analysis

Table 3: Regression Model Summary: Regulatory Dimensions and PSO Governance Quality

Model	R	R ²	Adj. R ²	Std. Error	F	Sig.
1	0.796	0.634	0.628	0.554	37.48	< .001

Source: Primary Data, 2026

Table 4: Regression Coefficients: Regulatory Predictors of PSO Governance Quality, Uganda

Variable	B	SE	Beta (β)	t	Sig.
(Constant)	0.624	0.241		2.590	.010
Licensing & Vetting Integration	0.387	0.073	0.413	5.301	< .001
Operational Standards Enforcement	0.304	0.078	0.341	3.897	< .001
Accountability & Complaints Resolution	0.228	0.071	0.250	3.211	.002

Dependent Variable: PSO Governance Quality

Source: Primary Data, 2026

The regression model was statistically significant ($F = 37.48$, $p < .001$), with the three regulatory dimensions collectively explaining 63.4% of the variance in PSO governance quality ($R^2 = 0.634$). Licensing and vetting regulatory integration was the strongest predictor ($\beta = 0.413$, $p < .001$), confirming that the coherence and coordination of the foundational entry-control mechanisms — personnel background checks, company registration standards, and the cross-verification of licensing data between UPF and MoIA — was the most critical governance quality determinant. Operational standards enforcement coherence was the second strongest predictor ($\beta = 0.341$, $p < .001$), reflecting the importance of consistent, harmonised standards application in shaping day-to-day PSO compliance behaviour. Accountability and complaints resolution contributed a smaller but significant positive effect ($\beta = 0.250$, $p = .002$), affirming that functional accountability mechanisms independently improved governance quality.

6.4 Structural Equation Model and Path Analysis

Table 5: SEM Fit Indices: PSO Regulatory Integration Model, Uganda

Fit Index	Value	Threshold	Assessment
χ^2/df	2.14	< 3.0	Good fit
CFI	0.961	≥ 0.95	Good fit

RMSEA	0.062	< 0.08	Acceptable
SRMR	0.053	< 0.08	Good fit
GFI	0.944	≥ 0.90	Good fit

Source: Primary Data, 2026

Structural Path Coefficients: PSO Regulatory Integration SEM, Uganda

Path	Std. β	SE	CR	p	Decision
Licensing & Vetting → Governance Quality	0.374	0.074	5.054	< .001	Supported
Operational Standards → Governance Quality	0.318	0.079	4.025	< .001	Supported
Accountability Mechanisms → Governance Quality	0.224	0.072	3.111	.002	Supported
Licensing & Vetting → Operational Standards (med.)	0.467	0.083	5.627	< .001	Supported
Indirect: Licensing → Op.Standards → Governance	0.147	0.045	3.267	.001	Supported
Total Effect: Licensing & Vetting → Governance	0.512	—	—	—	—
Total Effect: Operational Standards → Governance	0.318	—	—	—	—
Total Effect: Accountability → Governance	0.224	—	—	—	—

Source: Primary Data, 2026

The structural model confirmed operational standards enforcement as a significant partial mediator of the licensing and vetting integration–governance quality relationship (indirect $\beta = 0.147$, $p = .001$). This mediation pathway reflected a logical institutional cascade: integrated, coherent licensing and vetting processes established uniform entry standards that subsequently shaped the operational standards to which licensed PSOs were held — firms admitted through rigorous, consistent vetting were more likely to maintain the training, equipment, and operational standards that vetting prescribed, generating governance quality improvements through both the direct licensing quality channel and the downstream operational compliance channel. The total effect of licensing and vetting integration on PSO governance quality ($\beta = 0.512$) substantially exceeded its direct effect ($\beta = 0.374$), confirming the compounding governance returns on integrated licensing investment.

7.0 Discussion, Conclusions, and Recommendations

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The findings confirm that regulatory integration across all three PSO oversight dimensions significantly predicted governance quality, collectively explaining 63.4% of its variance. The dominant influence of licensing and vetting integration (total $\beta = 0.512$) and its compounding mediated effect through operational standards enforcement established the regulatory reform priority hierarchy: integrated vetting systems were both the most powerful direct governance driver and the foundational condition upon which coherent operational standards enforcement depended. The consistently below-midpoint mean for licensing and vetting integration (2.87) documented the most severe current deficit in Uganda's PSO regulatory architecture, identifying the most urgent reform target. Recommendations: (i) Uganda should establish a consolidated Private Security Regulatory Authority (PSRA) as an independent statutory body absorbing the PSO regulatory functions of both UPF PSRU and MoIA, eliminating the dual oversight architecture that generated coordination failures; (ii) pending consolidation, UPF and MoIA should jointly develop and operationalise a real-time shared digital PSO personnel registry accessible to both bodies, eliminating vetting gap exploitation; (iii) a unified national PSO training certification framework should be developed by the PSRA with mandatory minimum training hours, standardised qualification examinations, and digital certification records; (iv) a single, publicly accessible PSO complaint portal should be established routing complaints to the appropriate investigative body with published response time commitments; and (v) Uganda should ratify the Montreux Document on pertinent international law and good practices for private military and security companies, aligning its regulatory framework with international standards applicable to PSO operations in critical infrastructure and diplomatic protection contexts.

References

- Abrahamsen, R., & Williams, M. C. (2011). *Security Beyond the State: Private Security in International Politics*. Cambridge University Press.
- DCAF. (2015). *Security Sector Governance and Reform: Geneva Centre SSG Backgrounder*. Geneva Centre for DCAF.
- DCAF. (2021). *Uganda Private Security Sector Assessment Report*. Geneva Centre for Democratic Control of Armed Forces.
- Jensen, M. C., & Meckling, W. H. (1976). Theory of the firm. *Journal of Financial Economics*, 3(4), 305–360.
- March, J. G., & Olsen, J. P. (1989). *Rediscovering Institutions: The Organizational Basis of Politics*. Free Press.
- Mkutu, K., & Sabala, K. (2007). Private security companies in Kenya and Uganda: Selective professionalisation and the challenge of regulation. *Journal of Modern African Studies*, 45(3), 415–444.
- Muna, W. (2022). Private security regulation in East Africa: Gaps, overlaps and reform pathways. *Security Journal*, 35(4), 1012–1031.
- North, D. C. (1990). *Institutions, Institutional Change and Economic Performance*. Cambridge University Press.
- Uganda Law Reform Commission. (2019). *Review of the Private Security Organisations Act, 2002: Issues Paper*. ULRC.