

MEMPROW GIRLS NETWORK

**LAUNCH OF THE
POSITION PAPER**



**DISMANTLING SEXUAL
HARASSMENT IN HIGHER
INSTITUTIONS OF LEARNING.**



POSITION PAPER | OCTOBER 2026

Making Student Safety a Condition of Licence

A regulatory agenda for closing the scope, evidence, independence and financing gaps in sexual harassment policy in Uganda's higher learning institutions

Presented by

The MEMPROW Girls Network

In partnership with

The Equal Opportunities Commission

Submitted for

Validation and launch at the National Dialogue on Sexual Harassment Policy Reform in Higher Learning Institutions, 15 October 2026, Equal Opportunities Commission Conference Hall, Kampala

For transmission to

The Ministry of Education and Sports; the National Council for Higher Education; and university and tertiary institution councils, with monitoring of uptake led by the Equal Opportunities Commission

1. PURPOSE AND STATUS OF THIS PAPER

1.1 This paper is a policy instrument and not a record of proceedings. It is written to be acted upon by four identified duty bearers: the National Council for Higher Education, the Ministry of Education and Sports, the Equal Opportunities Commission, and the councils of universities and other tertiary institutions.

1.2 It rests on two years of student-led policy research, survivor-informed evidence generation, and advocacy by the MEMPROW Girls Network, working with students, university administrators, local government officials, and survivors in Kampala and the West Nile sub-region. The evidence base comprises capacity-building trainings, Mobile Testimony and Healing Clinics, Policy Jam Sessions convened in Kampala, Arua and Pakwach in 2026, and a structured institutional gap analysis covering six higher learning institutions, supplemented by national statistical sources and legal and regulatory analysis current to July 2026. Through this work, girls and young women did more than document harm: they tested institutional policies against lived experience and translated the findings into a concrete agenda for regulatory and institutional reform.

1.3 It addresses sexual harassment, sexual coercion and sexual exploitation in institutions regulated under the Universities and Other Tertiary Institutions Act, covering conduct by staff against students, by students against students, by staff against staff, and by third parties operating within or adjacent to the institutional environment. It treats technology-facilitated sexual and gender-based violence as integral to the subject matter rather than as an emerging annex to it.

1.4 The paper does not propose that internal disciplinary processes substitute for the criminal law. It proposes that they stop pretending to be it.

2. THE POSITION

2.1 Uganda does not have a sexual harassment problem in its higher learning institutions because it lacks rules. It has one because the rules that exist were never designed to be enforced, and because no national regulator has ever been required to establish whether they work.

2.2 Across every institution examined, the failure is not primarily one of policy language. It is a failure of regulatory architecture. Sexual harassment policy in Ugandan higher education is at present a voluntary, self-administered, unfunded and unaudited institutional courtesy. No statute imposes a duty on a university towards a student who is sexually harassed. No accreditation standard requires a policy. No regulator collects a single figure on incidence, reporting or sanction. Institutions accordingly respond to the only incentive the system creates, which is the protection of institutional reputation.

2.3 The submission of this paper is therefore a single proposition: that the protection of students from sexual harassment should cease to be a matter of institutional discretion and should become a condition of the licence to operate as a higher learning institution in Uganda. Every power needed to make that change already exists. Uganda therefore has the opportunity to lead the region in making student safety a measurable standard of quality, rather than a promise each institution keeps or breaks on its own.

3. THE EVIDENCE

3.1 The field engagements produce the following headline findings for the institutions surveyed.

INDICATOR	FINDING	SOURCE
Students experiencing sexual harassment or coercion	31% to 40%	MEMPROW Girls Network Policy Jam Sessions and Mobile Healing Clinics, 2026
Cases never reported through any channel	Approx. 70%	MEMPROW Girls Network Policy Jam Sessions, 2026
Survivors without a safe pathway to redress who go on to suffer at least one severe adverse outcome, being sustained academic decline, withdrawal from the institution, clinical depression, post-traumatic stress or suicidality	85%	MEMPROW Girls Network Mobile Testimony and Healing Clinics, 2026

INDICATOR	FINDING	SOURCE
Institutions surveyed holding a standalone and current sexual harassment policy	1 of 6	MEMPROW Girls Network institutional gap analysis, 2026

ILLUSTRATION OF THE FINDINGS

Applied to a cohort of 100 students, these findings indicate that between 31 and 40 students experience sexual harassment or coercion in the course of their studies; that approximately 70 per cent of those students do not report it; and that approximately one student in the cohort brings a complaint before an institutional authority. Of survivors who have no safe pathway to redress, 85 per cent suffer at least one severe adverse outcome, including academic decline, withdrawal, depression, post-traumatic stress or suicidality.

3.2 The relationship between the first two findings is the matter of central importance. If between three and four students in every ten experience harassment, and seven in ten of those cases are never reported, then roughly one student in every ten brings an incident to any institutional authority, while three to four in every ten have in fact been harmed. What institutions see is the smaller part of the problem. Every institutional statistic on sexual harassment in Uganda, every case log, every disciplinary return and every assurance that an institution has recorded very few cases is accordingly a measurement of the reporting system's failure and not of the incidence of harm.

3.3 The institutional picture sits within a national one. The Uganda Bureau of Statistics National Survey on Violence (2020) found that 95 per cent of Ugandan women and girls had experienced physical or sexual violence, or both, since the age of 15, and that 86 per cent had experienced violence in the workplace in the preceding twelve months. The Uganda Demographic and Health Survey recorded that more than one in five women aged 15 to 49 had experienced sexual violence. Uganda's undergraduate population falls squarely within the age band in which the highest incidence is recorded. Higher learning institutions are not a sanctuary from the national pattern. They are one of the principal settings in which it is enacted, with the additional feature that the perpetrator frequently controls the survivor's academic future.

3.4 Technology-facilitated sexual and gender-based violence is now a dominant modality of harassment among the student-age population and is almost entirely absent from Ugandan institutional policy. WOUGNET found that 88 per cent of Ugandan respondents had experienced or witnessed online gender-based violence, and that 67 per cent of women so affected reported resulting mental health consequences. UN Women reports that 58 per cent of girls and young women globally have experienced online harassment. In the higher education setting the conduct

takes forms that institutional policy does not name: non-consensual recording in hostels and washrooms; sextortion using intimate images obtained during a coerced relationship; circulation of images through institution-affiliated messaging groups; cyberstalking through institutional email and learning management systems; and AI-generated sexual imagery using students' faces. The harm is temporally continuous in a way that physical harassment is not, since the content may be replicated and recirculated indefinitely after the perpetrator has graduated or been dismissed.

3.5 The non-reporting rate is not a measure of student reticence. It is a measure of an accurately assessed risk. A student who declines to report is in most cases making a rational calculation about a system whose observable outputs are these: the complaint will be heard by colleagues of the respondent; the standard of proof will be one the evidence cannot meet; the process will outlast the remaining academic year; the respondent will retain control of the complainant's marks throughout; and there is no protection against retaliation. A reporting rate measures not how much harm occurred but how far the institution has made it safe to say so.

3.6 Student evidence also identifies internships and field placements as a significant protection gap. In consultations and follow-up conversations led by the MEMPROW Girls Network, several students reported harassment at internship placements by supervisors or other workplace actors whose approval could affect assessment, completion, recommendations or future opportunities. Because these placements are required, recognised or facilitated by institutions, the risk cannot be treated as external to higher education. Yet students often encounter a jurisdictional vacuum: the institution regards the incident as a workplace matter, while the host organisation regards the student as the institution's responsibility.

3.7 The consequences do not end when the incident or complaint process ends. During the Girls Network's final engagement on X/Twitter, a survivor explained that mental health support was necessary for her recovery. That testimony is consistent with the evidence at paragraph 3.1 and with the mental health consequences documented at paragraph 3.4. Therapy is therefore not an optional welfare add-on. It is part of an effective remedy, enabling survivors to recover, remain engaged in learning and continue their studies without bearing the cost of institutional failure alone.

CASE ILLUSTRATION

The following case, reported in the course of the Girls Network's engagements with students, illustrates the jurisdictional gap identified in Part 4. Identifying details have been withheld.

Makerere University. A female student at Makerere University was sexually assaulted in her hostel. She reported the assault to the University administration and asked for help. The

administration told her it could not act, because the University's sexual harassment policy protects students while they are within the University and does not extend to hostels. She was left with no institutional remedy, no protection and no support. Her case is the jurisdictional under-reach described at paragraph 4.1(2) in its plainest form.

Support for survivors. Sauti 116, Uganda's national toll-free helpline, receives reports of violence and abuse from children and adults and provides referral to support services.

4. THE SIX STRUCTURAL GAPS

4.1 The findings resolve into six structural gaps, each of which is a defect of design rather than of implementation.

1. **Absence of a standalone instrument.** Several institutions have no dedicated sexual harassment policy at all, relying on generalised student codes of conduct which neither define sexual harassment nor prescribe a procedure for it.
2. **Jurisdictional under-reach.** Where policies exist they are territorially confined to the physical campus, leaving off-campus hostels, institution-affiliated transit, third-party contractors, field placements and internships outside institutional protection. These are precisely the settings in which students are most exposed.
3. **An imported criminal standard of proof.** Internal disciplinary bodies routinely apply a standard of proof beyond reasonable doubt, borrowed from the criminal courts. Sexual harassment characteristically produces no forensic trace and is thereby rendered structurally unprovable in the very forum designed to address it.
4. **Unfunded mandates.** There is a near-total absence of dedicated budget lines for independent investigation, trauma-informed counselling, medical and forensic response, or committee training. A policy without a budget line is a statement of aspiration and not a system of protection.
5. **Absence of independence.** Investigation and adjudication are conducted by internal faculty peers who hold collegial, departmental and supervisory relationships with the respondent. Favouritism is not an aberration within this design. It is its predictable output.
6. **Scope obsolescence.** Policies drafted before 2018 are silent on technology-facilitated abuse and are frequently silent on peer-to-peer harassment and on harassment of staff by staff.

4.2 These gaps compound rather than merely coexist. A student harassed off campus by a supervisor on whom she depends for a placement sign-off encounters, in sequence, a policy that does not reach the location, a committee composed of the respondent's colleagues, a standard of

proof her evidence cannot satisfy, and no funded counselling at the conclusion. Any one gap would deter reporting. In combination they make it irrational.

5. THE LEGAL POSITION IN 2026

5.1 Two developments render this paper urgent rather than merely timely.

The Employment (Amendment) Act, 2025

5.2 Assented to on 29 April 2026, the Act removed the twenty-five-employee threshold and now obliges every employer in Uganda to put in place measures to prevent sexual harassment and to display those measures conspicuously at the workplace, with an expanded statutory definition of workplace and a new general prohibition on harassment and intimidation. Every university and tertiary institution in Uganda is an employer and is squarely caught by this duty. The Act however protects employees, and a student is not an employee.

THE RESULTING ASYMMETRY

A Ugandan university is now legally obliged to protect its cleaner from sexual harassment by a lecturer, and legally obliged to protect nobody at all from the same lecturer where the complainant is a first-year student.

The closure of the legislative route

5.3 On 17 March 2026 the Constitutional Court nullified the Computer Misuse (Amendment) Act, 2022 in its entirety for want of quorum, together with the provisions criminalising the unauthorised recording of another person, the non-consensual sharing of children's information, and content which ridicules, degrades or demeans. On 12 March 2026 the Sexual Offences Bill was withdrawn from Parliament after a decade of failed attempts.

5.4 Uganda's legal protection against image-based sexual abuse is consequently thinner in mid-2026 than it was in 2025, and the legislative route to repairing it has closed. Reform must therefore proceed through regulation, accreditation and statutory enforcement, and not by awaiting a new criminal statute. Each recommendation in Part 6 is achievable under powers that already exist and none requires new primary legislation.

6. RECOMMENDATIONS: THE FIVE PRIORITY ASKS

6.1 The full paper advances thirty-one recommendations across six parts. The five below are the irreducible core. Recommendation 1 is the lever on which the other four depend: once safeguarding is a condition of accreditation, every other measure acquires an enforcement route.

Recommendation 1. Make a compliant sexual harassment policy a condition of accreditation.

The National Council for Higher Education should amend the Universities and Other Tertiary Institutions (Basic Requirements and Minimum Standards) Regulations to insert a Sexual Harassment and Safeguarding standard, assessed at licensing, at accreditation and at re-accreditation. This is effected by statutory instrument and not by Act of Parliament.

What the Council gains: a single, auditable standard that turns safeguarding into evidence of quality, strengthens its hand at every licensing and re-accreditation, and places Uganda's regulator at the front of the region on student safety.

Addressed to: National Council for Higher Education. Implementation horizon: twelve months.

Recommendation 2. Issue a compliance directive under the Equal Opportunities Commission Act.

Under section 15(4)(b) of the Equal Opportunities Commission Act, 2007 the Commission may order any institution to take particular steps to promote equal opportunities, and the institution must implement within six months. The Commission should issue a directive to all licensed higher learning institutions requiring a compliant policy, an independent committee, a funded response and annual disaggregated reporting.

What the Commission gains: a measurable national compliance record to lay before Parliament under article 32(4), and visible delivery of its constitutional mandate in a sector where it has not yet been tested.

Addressed to: Equal Opportunities Commission. Power relied upon: section 15(4)(b). Implementation horizon: immediate, with six-month compliance.

Recommendation 3. Replace the criminal standard of proof with the balance of probabilities.

Every institutional policy should state expressly that internal proceedings are administrative and not criminal in character, are determined on the balance of probabilities, and admit neither a corroboration requirement nor evidence of the complainant's sexual history.

What institutions gain: decisions that withstand appeal and judicial review, fewer protracted disputes, and a process students trust enough to use, so that cases are resolved inside the institution rather than in the courts or the press.

Addressed to: institutional councils. Implementation horizon: the next policy cycle.

Recommendation 4. Extend policy jurisdiction to where students actually are.

Scope must cover off-campus hostels and institution-recognised accommodation, institution-affiliated transport, third-party contractors and service providers, field placements, internships and teaching practice, online and digital environments, and conduct at any institution-affiliated event wherever it occurs. Each policy must also establish a clear reporting and support protocol for placement-related harassment: a named university focal point, confidential reporting routes, immediate safety and non-retaliation measures, protection of grades and placement completion, access to an alternative placement without academic penalty, and coordinated action with the host organisation.

What institutions gain: certainty about where their responsibility begins and ends, stronger and safer partnerships with placement hosts, and alignment with ILO Convention No. 190, which Uganda has ratified and which already protects interns and persons in training.

Addressed to: institutional councils, supported by the accreditation standard at Recommendation 1. Implementation horizon: twelve months.

Recommendation 5. Provide dedicated and ring-fenced funding for safeguarding.

A ring-fenced minimum allocation within each institution's annual budget for safeguarding, covering independent investigation, medical and forensic response, training, data, counselling and therapy, with disclosure of the allocated figure in the annual return to the regulator. Every policy should contain a mandatory mental health support clause guaranteeing prompt, confidential and trauma-informed assessment, counselling and therapy by qualified professionals, available from first disclosure through recovery and academic reintegration, whether or not the survivor pursues a formal complaint.

What the Ministry and institutions gain: retention of students who would otherwise drop out, protection against far costlier liability and reputational crises, and a credible answer to Uganda's commitment under article 12(1)(d) of the Maputo Protocol to provide counselling and rehabilitation.

Addressed to: institutional councils and the Ministry of Education and Sports. Implementation horizon: the next budget cycle.

6.2 The remaining recommendations address independent committee design, survivor-centred reporting and protection against retaliation, interim protective measures, an explicit reporting and support framework for internships and field placements, mandatory and role-specific training, guaranteed mental health therapy and academic reintegration support, the regulation of power-differential relationships, the particular dynamics of faith-based and single-sex institutions, a

rights-respecting response to technology-facilitated abuse, and a monitoring framework anchored in the Commission's constitutional reporting duty to Parliament under article 32(4) of the Constitution.

7. THE STANDARD AGAINST WHICH UGANDA IS MEASURED

7.1 Uganda is not at liberty to choose whether to act.

INSTRUMENT	OBLIGATION ENGAGED
Maputo Protocol, article 12(1)(c) and (d)	Ratified by Uganda. Obliges States Parties to protect women, and especially the girl child, from all forms of abuse including sexual harassment in schools and other educational institutions; to provide for sanctions against the perpetrators; and to provide access to counselling and rehabilitation services to those who suffer such abuse.
ILO Convention No. 190 on Violence and Harassment	Ratified by Uganda on 7 August 2023. Applies to violence and harassment in the world of work, expressly including persons in training, interns and apprentices.
CEDAW General Recommendations 19 and 35	A State's failure to exercise due diligence to prevent and respond to gender-based violence committed by private actors is itself a violation.
Constitution of the Republic of Uganda, articles 21, 24, 30, 32 and 33	Equality and freedom from discrimination; freedom from cruel, inhuman or degrading treatment; the right to education; affirmative action; and the rights of women. Article 32(4) carries the Equal Opportunities Commission's duty to report to Parliament.

7.2 The gap documented in this paper is accordingly not merely a policy shortfall. It is a standing breach of binding obligations, and it is capable of remedy by regulators who already hold the necessary powers.

8. WHAT IS ASKED OF THIS DIALOGUE

8.1 That the National Dialogue validate this paper and the five priority recommendations set out at Part 6, and secure on the day one clear commitment, set out at paragraph 8.2, on which the others depend.

8.2 That the National Council for Higher Education commit publicly to initiating the regulatory amendment at Recommendation 1, and in the interim to issuing a circular to all licensed institutions. This is the single commitment the Dialogue is asked to secure today.

WHAT FOLLOWS OVER THE NEXT TWELVE MONTHS

Once that commitment is secured, the Dialogue invites the following duty bearers to build on it.

8.3 That the Equal Opportunities Commission commit to issuing a compliance directive under section 15(4)(b), to conducting a national compliance audit, and to publishing the resulting index.

8.4 That the Ministry of Education and Sports commit to a national policy on the prevention of and response to sexual harassment in education institutions, and to a ring-fenced safeguarding allocation for public institutions that expressly funds confidential, trauma-informed counselling and therapy.

8.5 That the institutional councils represented commit to adopting the model architecture within one policy cycle, including the internship and field placement protocol and mandatory mental health support, and that progress be reported to the Commission annually and laid before Parliament under article 32(4).

NOTES

On the data. The prevalence figures at paragraph 3.1 derive from the MEMPROW Girls Network's own field engagements and from institution-level disclosures. They are consistent in direction and magnitude with the wider East African literature, but they are not a nationally representative probability sample and this paper does not present them as one. That limitation is itself part of the argument. Uganda has no national baseline on sexual harassment in higher education because no institution has ever been required to produce one. The absence of official data is not a neutral gap in the record. It is the mechanism by which the problem has been kept unmeasurable and therefore unaccountable.

On language. This paper uses the term survivor in preference to victim, except where a legal context requires otherwise. It refers to students rather than to girls, because sexual harassment in higher learning institutions affects women students disproportionately but not exclusively, and framing it as a girls' problem invites the protective paternalism the full paper criticises.

On care. This paper discusses sexual violence, its psychological consequences and suicidality. Institutions circulating it should ensure that confidential referral information for qualified counselling and therapy accompanies it, and that any dissemination to student bodies is paired with an immediately available support pathway.

MEMPROW Girls Network. Position Paper, October 2026. *Making Student Safety a Condition of Licence*. Prepared in partnership with the Equal Opportunities Commission. The full paper, containing thirty-one recommendations across six parts together with the institution-by-institution findings, is available on request. A summary policy brief accompanies it for the National Dialogue.

