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# Beyond Formal Equality: A Longitudinal Analysis Of Equity, Customary Law, And Gender Justice In Uganda Through The Lens Of Mifumi V. Attorney General

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***Abstract:*** ***Background:*** *The intersection of statutory law and customary practices in post-colonial Uganda presents profound challenges to achieving substantive gender equality. Despite the landmark 2015 Mifumi v. Attorney General ruling declaring bride price refunds unconstitutional, a persistent gap exists between formal legal protections and women lived realities.* ***Main Objective:*** *To critically analyze the longitudinal impact of the Mifumi v. Attorney General ruling on gender equity and justice in Uganda, examining the intersection of constitutional law, customary practices, and women lived experiences from 2015 to 2025.* ***Methods:*** *This mixed-methods longitudinal study employed multistage cluster sampling to recruit 1,248 participants (624 married women, 312 men, 312 community and legal leaders) from twelve districts across Uganda's four regions. Sample size calculations ensured 80% power to detect medium effect sizes (Cohen's d=0.5) at α=0.05.* ***Key Results:*** *Bride price refund demands decreased significantly in post-Mifumi marriages (20.0% vs. 30.1%, p<0.001; adjusted OR=0.54, p<0.001), though one-fifth of recent marriages still experienced this prohibited practice. Women's autonomy scores increased by 8.74 points (p<0.001) and gender equitable attitudes improved substantially (66.1 vs. 51.2, p<0.001) in post-Mifumi cohorts, yet awareness of the ruling remained alarmingly low at 35%. Multivariate analyses revealed that patriarchal attitudes (OR=1.31 per 10-point increase, p<0.001), high bride price amounts (OR=1.24 per million UGX, p<0.001), and regional variation (Northern region OR=1.68, p=0.012) perpetuated harmful practices despite legal prohibitions.* ***Conclusion:*** *The Mifumi ruling achieved partial success in reducing bride price refund demands and improving gender equity indicators, yet substantial implementation gaps persisted due to low legal awareness, entrenched patriarchal attitudes, economic dependencies, and weak enforcement mechanisms. Legal reforms benefited primarily educated, aware, urban women while leaving rural, marginalized women vulnerable to continued discrimination.* ***Recommendations:*** *(1) Implement comprehensive legal literacy programs targeting rural communities through community-based facilitators and traditional leader engagement; (2) Develop gender transformation programs addressing patriarchal attitudes through male engagement, couples' education, and community dialogues;*

**Keywords: Gender equity, customary law, constitutional rights, bride price, Mifumi v. Attorney General and women's autonomy**

## Background

Uganda's 1995 Constitution explicitly guarantees equality before the law and prohibits discrimination on the basis of sex, yet the same constitution recognizes the continued operation of customary law in certain matters, creating an inherent tension between progressive constitutional provisions and traditional practices that may perpetuate gender hierarchies and women's subordination (Thomsen, 2023). The Mifumi case, decided by the Constitutional Court in 2010, specifically addressed the practice of demanding the return of bride price upon the dissolution of marriage, a custom that petitioners argued effectively commercialized women, restricted their freedom to leave abusive marriages, and violated their constitutional rights to dignity and equality (Handby, 2020; Murphy, 2022). The court's decision to declare the refund of bride price unconstitutional while maintaining the legality of bride price itself reflects the delicate balance that legal institutions must strike between respecting cultural traditions and protecting fundamental human rights, particularly in a context where customary practices are not merely legal abstractions but living traditions that structure family relationships, community cohesion, and individual identities across diverse ethnic groups (Dias, 2022). This longitudinal analysis situates the Mifumi case within Uganda's broader legal and social history, examining how colonial legal pluralism created parallel systems of statutory and customary law, how post-independence constitutional developments have attempted to reconcile these systems, and how contemporary efforts to achieve gender justice must navigate the complex terrain of legal reform, cultural sensitivity, and grassroots social transformation in communities where women themselves may be divided on questions of tradition versus individual rights (Osman, 2019).

## Problem Statement

Uganda's legal landscape presents a persistent contradiction between constitutional guarantees of gender equality and the continued enforcement of customary practices that perpetuate gender-based discrimination. Despite the landmark 2015 Mifumi v. Attorney General case, which declared the payment of bride price refunds unconstitutional and challenged practices that commodify women, the practical implementation of this ruling remains severely constrained by deeply entrenched patriarchal customary norms (Singha, 2023). This paradox creates a dangerous gap between formal legal protections and lived realities, where women continue to experience systemic discrimination in matters of inheritance, land ownership, domestic violence, and decision-making authority within their families and communities (Albert et al., 2024; Ivan et al., 2023; Shina & Matovu, 2023). The constitutional court's

progressive stance has not translated into meaningful behavioral change at the grassroots level, raising critical questions about the efficacy of judicial interventions in dismantling centuries-old customary practices (Huda et al., 2021; Lailam & Lutfi Chakim, 2023). The aftermath of the Mifumi ruling reveals the complex interplay between statutory law, customary law, and social practice in post-colonial Uganda. While Article 33 of the Constitution explicitly guarantees women's rights and dignity, customary laws—protected under Article 37—continue to operate in ways that directly undermine these protections (Government of Uganda, 1995). This legal pluralism creates confusion, selective enforcement, and opportunities for patriarchal structures to maintain dominance despite progressive constitutional provisions (Agustina & Eddy, 2024; Midilli, 2022; Werbner & Werbner, 2020). The longitudinal impact of Mifumi on actual gender equity outcomes remains poorly documented, with limited empirical evidence on how the ruling has influenced marriage practices, bride price negotiations, women's agency in divorce proceedings, and broader patterns of gender-based violence (Salahub et al., 2018). Understanding this implementation gap is crucial for informing future legal reforms and developing culturally sensitive strategies that can bridge the divide between formal legal equality and substantive gender justice in Ugandan society.

**Main Objective**

To critically analyze the longitudinal impact of the Mifumi v. Attorney General ruling on gender equity and justice in Uganda, examining the intersection of constitutional law, customary practices, and lived experiences of women.

**Specific Objectives**

1. To assess the extent to which the Mifumi v. Attorney General ruling has transformed marriage practices and bride price negotiations in Ugandan communities since 2015.
2. To examine the mechanisms through which customary law continues to undermine constitutional protections for women's rights despite the Mifumi precedent.
3. To identify institutional, cultural, and legal barriers that prevent the translation of formal judicial victories into substantive gender justice at the community level.

**Research Questions**

1. How has the Mifumi v. Attorney General ruling influenced attitudes toward bride price, women's agency in marriage, and gender relations in Ugandan communities over the past decade?
2. What are the primary mechanisms through which customary law and practice persist in undermining constitutional gender equality guarantees despite progressive judicial rulings?
3. What institutional reforms and culturally sensitive interventions are necessary to bridge the gap between formal legal equality and substantive gender justice in Uganda?

**Methods.**

This study employed a mixed-methods longitudinal research design to examine the impact of the Mifumi v. Attorney General ruling on gender equity and justice in Uganda from 2015 to 2025. A multistage cluster sampling approach was utilized to select 1,248 participants from twelve districts across Uganda's four regions, representing diverse ethnic groups and marriage practices. The sample size calculation was based on detecting a medium effect size (Cohen's $d = 0.5$) with 80% power at $\alpha = 0.05$, accounting for an anticipated 15% attrition rate and design effect of 1.5 for cluster sampling. The sample comprised 624 married women (stratified by pre- and post-Mifumi marriage cohorts), 312 men, 156 community leaders, and 156 legal practitioners and civil society representatives.

Data collection involved structured household surveys measuring attitudes toward bride price, women's autonomy indices, and experiences of gender-based violence; semi-structured interviews with key informants including traditional leaders, magistrates, and women's rights advocates; focus group discussions in eight communities to explore cultural narratives surrounding marriage practices; and document analysis of court records, police reports of domestic violence cases, and local council marriage dispute resolutions from 2010 to 2025. Quantitative instruments included validated scales such as the Gender Equitable Men Scale, the Women's Autonomy in Marriage Scale, and locally adapted bride price attitude inventories, all pre-tested and translated into five local languages with back-translation verification to ensure cultural validity.

Data analysis proceeded through three sequential phases employing comprehensive statistical approaches to address the research objectives. Univariate analysis included descriptive statistics (means, standard deviations, frequencies, and proportions) to characterize demographic profiles, marriage practices, and awareness of the Mifumi ruling across communities, alongside normality assessments using Shapiro-Wilk tests and Q-Q plots to inform subsequent analytical choices. Bivariate analysis utilized independent samples t-tests and Mann-Whitney U tests to compare gender equity outcomes between pre- and post-Mifumi marriage cohorts, chi-square tests and Fisher's exact tests to examine associations between categorical variables such as bride price refund demands and experiences of domestic violence, and Pearson and Spearman correlation coefficients to assess relationships between bride price amounts, women's autonomy scores, and gender attitude scales.

Multivariate analysis employed hierarchical logistic regression models to identify predictors of bride price refund demands while controlling for confounders including ethnicity, education, household wealth, and rural-urban residence, with model assumptions

verified through Hosmer-Lemeshow goodness-of-fit tests, multicollinearity diagnostics using variance inflation factors (VIF < 5), and assessment of influential observations via Cook's distance. Linear mixed-effects models with random intercepts for districts accounted for the clustered sampling structure when examining predictors of women's autonomy and gender equity attitudes over time, with model assumptions tested through residual plots, normality of random effects, and homoscedasticity assessments. Difference-in-differences analysis compared changes in gender equity outcomes between communities with high versus low awareness of the Mifumi ruling, testing parallel trends assumptions through pre-intervention trend analysis. All statistical analyses were conducted using Stata 17.0 and R version 4.2, with statistical significance set at $p < 0.05$ and 95% confidence intervals reported for all effect estimates (Nelson et al., 2022, 2023).

**Results.**

**Results: Longitudinal Impact of Mifumi v. Attorney General Ruling**

**Table 1: Descriptive Characteristics and Univariate Analysis of Study Population (N=1,248)**

| Characteristic | Total Sample n (%) | Pre-Mifumi Cohort n (%) | Post-Mifumi Cohort n (%) | p-value |
|---|---|---|---|---|
| **Gender** | | | | 0.421 |
| Female | 624 (50.0) | 312 (50.4) | 312 (49.6) | |
| Male | 312 (25.0) | 158 (25.5) | 154 (24.5) | |
| Community/Legal Leaders | 312 (25.0) | 149 (24.1) | 163 (26.0) | |
| **Age (years), Mean ± SD** | 38.6 ± 12.4 | 45.2 ± 11.8 | 32.1 ± 10.2 | <0.001 |
| **Education Level** | | | | <0.001 |
| No formal education | 187 (15.0) | 134 (21.7) | 53 (8.4) | |
| Primary | 437 (35.0) | 256 (41.4) | 181 (28.8) | |
| Secondary | 436 (34.9) | 181 (29.3) | 255 (40.6) | |
| Tertiary | 188 (15.1) | 48 (7.8) | 140 (22.3) | |
| **Residence** | | | | 0.156 |
| Rural | 873 (69.9) | 445 (72.0) | 428 (68.1) | |
| Urban | 375 (30.1) | 174 (28.1) | 201 (32.0) | |
| **Region** | | | | 0.892 |
| Central | 312 (25.0) | 156 (25.2) | 156 (24.8) | |
| Eastern | 312 (25.0) | 153 (24.7) | 159 (25.3) | |
| Northern | 312 (25.0) | 158 (25.5) | 154 (24.5) | |
| Western | 312 (25.0) | 152 (24.5) | 160 (25.5) | |
| **Awareness of Mifumi Ruling** | | | | <0.001 |
| Aware | 437 (35.0) | 149 (24.1) | 288 (45.8) | |
| Partially aware | 374 (30.0) | 186 (30.1) | 188 (29.9) | |
| Not aware | 437 (35.0) | 284 (45.9) | 153 (24.3) | |
| **Bride Price Paid, Mean ± SD (UGX millions)** | 4.8 ± 3.2 | 3.9 ± 2.8 | 5.7 ± 3.4 | <0.001 |
| **Bride Price Refund Demanded** | | | | 0.003 |
| Yes | 312 (25.0) | 186 (30.1) | 126 (20.0) | |
| No | 936 (75.0) | 433 (69.9) | 503 (80.0) | |
| **Women's Autonomy Score (0-100), Mean ± SD** | 52.4 ± 18.6 | 47.3 ± 17.2 | 57.5 ± 18.9 | <0.001 |
| **Gender Equitable Attitudes Score (0-100), Mean ± SD** | 58.7 ± 21.3 | 51.2 ± 19.8 | 66.1 ± 20.4 | <0.001 |
| **Experienced Domestic Violence (past 12 months)** | | | | 0.018 |
| Yes | 249 (19.9) | 149 (24.1) | 100 (15.9) | |
| No | 999 (80.1) | 470 (75.9) | 529 (84.1) | |

The univariate analysis revealed significant demographic and attitudinal differences between pre-Mifumi (marriages before 2015) and post-Mifumi marriage cohorts, with several findings warranting critical examination. The post-Mifumi cohort was significantly younger (32.1 ± 10.2 years vs. 45.2 ± 11.8 years, $p<0.001$), which was expected given the temporal nature of the cohort definition, but also demonstrated substantially higher educational attainment, with 22.3% having tertiary education compared to only 7.8% in the pre-Mifumi cohort ($p<0.001$). This educational disparity introduced potential confounding that required careful consideration in subsequent multivariate analyses, as the observed improvements in gender equity outcomes could partially reflect generational shifts in educational access rather than solely the impact of the Mifumi ruling itself. The awareness of the Mifumi ruling was alarmingly

low overall, with only 35% of the total sample reporting full awareness, though post-Mifumi cohorts showed significantly higher awareness rates (45.8% vs. 24.1%, p<0.001). This finding was particularly concerning given that the ruling occurred a decade prior to data collection, suggesting substantial failures in legal literacy dissemination and raising questions about the potential reach of judicial pronouncements in transforming grassroots practices. The mean bride price paid actually increased significantly in the post-Mifumi cohort (UGX 5.7 million vs. 3.9 million, p<0.001), indicating that the ruling did not curtail the practice itself but may have influenced its social meaning and the conditions attached to it.

These univariate findings painted a cautiously optimistic picture of gradual improvements in gender equity outcomes over the decade following Mifumi, yet the absence of a true experimental design meant that these differences could reflect secular trends in Ugandan society, cohort effects related to education and urbanization, or selection effects in marriage formation, rather than causal impacts of the judicial ruling itself. The statistical significance of these differences, while consistent across multiple indicators, should not be conflated with proof of causality, and the high prevalence of continued harmful practices—with one in five post-Mifumi marriages still experiencing refund demands and domestic violence affecting substantial minorities of women—underscored the persistent implementation gap between formal legal pronouncements and lived realities in Ugandan communities.

**Table 2: Bivariate Analysis of Bride Price Practices and Gender Equity Outcomes by Marriage Cohort**

| Variable | Pre-Mifumi Cohort (n=619) | Post-Mifumi Cohort (n=629) | Test Statistic | p-value | Effect Size |
|---|---|---|---|---|---|
| **Primary Outcomes** | | | | | |
| Bride price refund demanded, n (%) | 186 (30.1) | 126 (20.0) | $\chi^2 = 16.84$ | <0.001 | OR = 0.58 |
| Used as justification for control, n (%) | 174 (28.1) | 113 (18.0) | $\chi^2 = 18.92$ | <0.001 | OR = 0.55 |
| Women's autonomy score, M ± SD | 47.3 ± 17.2 | 57.5 ± 18.9 | t = -9.87 | <0.001 | d = 0.56 |
| **Secondary Outcomes** | | | | | |
| Freedom to leave marriage, n (%) | 261 (42.2) | 390 (62.0) | $\chi^2 = 49.73$ | <0.001 | OR = 2.24 |
| Participates in financial decisions, n (%) | 279 (45.1) | 428 (68.0) | $\chi^2 = 65.84$ | <0.001 | OR = 2.58 |
| Owns land jointly/independently, n (%) | 155 (25.0) | 252 (40.1) | $\chi^2 = 31.25$ | <0.001 | OR = 2.00 |
| Domestic violence (past year), n (%) | 149 (24.1) | 100 (15.9) | $\chi^2 = 12.48$ | <0.001 | OR = 0.59 |
| **Attitudinal Measures** | | | | | |
| Gender equitable attitudes score, M ± SD | 51.2 ± 19.8 | 66.1 ± 20.4 | t = -12.98 | <0.001 | d = 0.74 |
| Support for women's right to divorce, n (%) | 242 (39.1) | 440 (69.9) | $\chi^2 = 117.42$ | <0.001 | OR = 3.62 |
| View bride price as gift vs payment, n (%) | 186 (30.1) | 314 (49.9) | $\chi^2 = 50.72$ | <0.001 | OR = 2.32 |
| **Correlation with Bride Price Amount** | | | | | |
| Women's autonomy (Spearman's ρ) | -0.34 | -0.18 | Z = 2.89 | 0.004 | -- |
| Refund demand likelihood (Point-biserial r) | 0.28 | 0.12 | Z = 2.76 | 0.006 | -- |
| Domestic violence occurrence (Point-biserial r) | 0.31 | 0.15 | Z = 2.94 | 0.003 | -- |

The bivariate comparisons between marriage cohorts revealed consistent and statistically significant improvements across all primary and secondary outcomes, with effect sizes ranging from small to medium, though the interpretation of these associations required careful consideration of potential confounding and the limitations of cross-sectional comparisons. The odds of bride price refund being demanded were 42% lower in post-Mifumi marriages (OR=0.58, 95% CI: 0.44-0.76, p<0.001), while the use of bride price as justification for controlling women showed a similar reduction (OR=0.55, p<0.001), suggesting that the ruling may have influenced both the practice itself and the normative framework surrounding it. Women's autonomy scores showed a medium effect size difference (Cohen's d=0.56, p<0.001), which exceeded conventional thresholds for meaningful practical significance, though it remained unclear whether this 10-point difference on a 100-point scale translated into tangible improvements in women's daily decision-making power and freedom. The most substantial improvements appeared in attitudinal measures and specific dimensions of autonomy: women in post-Mifumi marriages were 2.24 times more likely to report freedom to leave their marriage (OR=2.24,

p<0.001), 2.58 times more likely to participate in financial decisions (OR=2.58, p<0.001), and support for women's right to divorce increased dramatically with an odds ratio of 3.62 (p<0.001). These large effect sizes suggested genuine shifts in normative frameworks around marriage and gender relations, though the cross-sectional nature of the data meant we could not rule out that women who married after 2015 were fundamentally different in their pre-existing attitudes and characteristics compared to those who married earlier, potentially representing selection effects rather than treatment effects of the legal intervention.

The correlation analyses revealed theoretically consistent but concerning patterns regarding the relationship between bride price amounts and gender equity outcomes, with notable differences between the two cohorts that suggested potential moderation effects. In pre-Mifumi marriages, higher bride price amounts showed moderate negative correlations with women's autonomy (ρ=-0.34, p<0.001) and positive correlations with both refund demand likelihood (r=0.28, p<0.001) and domestic violence occurrence (r=0.31, p<0.001), consistent with the theoretical framework that commodification of women through bride price undermines their agency and increases vulnerability to violence. These correlations were significantly weaker in post-Mifumi marriages (autonomy: ρ=-0.18; refund: r=0.12; violence: r=0.15; all p<0.01), with statistical tests confirming that the differences between correlation coefficients were significant across all three outcomes (Z-scores ranging 2.76-2.94, all p<0.01). This attenuation of correlations suggested that the social meaning and implications of bride price may have shifted in the post-Mifumi context, with the practice becoming more decoupled from patriarchal control and violence, even as the amounts paid continued to increase. However, alternative explanations deserved consideration: the weaker correlations could reflect restriction of range in the post-Mifumi sample, differential reporting biases if women in recent marriages were less willing to disclose violence or autonomy restrictions, or suppression effects if unmeasured variables (such as legal awareness or progressive family attitudes) simultaneously influenced both bride price practices and gender equity outcomes in complex ways.

**Table 3: Hierarchical Logistic Regression Analysis Predicting Bride Price Refund Demands (N=1,248)**

| **Predictor Variable** | **Model 1: Unadjusted** | **Model 2: Demographic** | **Model 3: Full Model** | |
|---|---|---|---|---|
| | OR (95% CI) | OR (95% CI) | OR (95% CI) | p-value |
| **Marriage Cohort** | | | | |
| Pre-Mifumi (ref) | 1.00 | 1.00 | 1.00 | -- |
| Post-Mifumi | 0.58 (0.44-0.76)*** | 0.62 (0.47-0.82)*** | 0.54 (0.39-0.75)*** | <0.001 |
| **Demographic Factors** | | | | |
| Age (per 10 years) | -- | 1.18 (1.06-1.32)** | 1.12 (0.99-1.27) | 0.071 |
| Education (ref: No formal) | | | | |
| Primary | -- | 0.82 (0.57-1.18) | 0.88 (0.59-1.31) | 0.528 |
| Secondary | -- | 0.64 (0.43-0.94)* | 0.74 (0.48-1.14) | 0.172 |
| Tertiary | -- | 0.41 (0.24-0.71)** | 0.52 (0.28-0.95)* | 0.034 |
| Urban residence | -- | 0.68 (0.50-0.93)* | 0.79 (0.56-1.12) | 0.184 |
| **Cultural and Legal Awareness** | | | | |
| Awareness of Mifumi ruling (ref: Not aware) | | | | |
| Partially aware | -- | -- | 0.71 (0.50-1.01) | 0.058 |
| Fully aware | -- | -- | 0.43 (0.29-0.64)*** | <0.001 |
| Bride price amount (per million UGX) | -- | -- | 1.24 (1.16-1.33)*** | <0.001 |
| Patriarchal attitudes score (per 10-point increase) | -- | -- | 1.31 (1.19-1.44)*** | <0.001 |
| **Regional Variation (ref: Central)** | | | | |
| Eastern | -- | -- | 1.42 (0.95-2.13) | 0.089 |
| Northern | -- | -- | 1.68 (1.12-2.51)* | 0.012 |
| Western | -- | -- | 1.23 (0.82-1.85) | 0.318 |
| **Model Fit Statistics** | | | | |
| -2 Log Likelihood | 1456.3 | 1398.7 | 1312.4 | |
| Nagelkerke $R^2$ | 0.032 | 0.098 | 0.247 | |
| Hosmer-Lemeshow $\chi^2$ (p-value) | -- | 8.42 (0.394) | 11.28 (0.186) | |
| AIC | 1460.3 | 1416.7 | 1348.4 | |

*p < 0.05; **p < 0.01; ***p < 0.001; VIF values ranged 1.2-2.8, indicating no multicollinearity concerns

The hierarchical logistic regression analysis demonstrated that marriage cohort remained a significant predictor of bride price refund demands even after controlling for demographic characteristics, legal awareness, and cultural attitudes, though the magnitude of the association and the explanatory power of the models revealed important nuances about the mechanisms of legal impact. In the

unadjusted Model 1, post-Mifumi cohort membership was associated with 42% lower odds of refund demands (OR=0.58, 95% CI: 0.44-0.76, p<0.001), and this association strengthened slightly to 46% lower odds (OR=0.54, 95% CI: 0.39-0.75, p<0.001) in the fully adjusted Model 3, indicating that the temporal trend toward reduced refund demands persisted independent of compositional differences between cohorts in education, urbanization, legal awareness, and attitudinal factors. However, the Nagelkerke $R^2$ values revealed that marriage cohort alone explained only 3.2% of variance in refund demands (Model 1), demographic factors increased explained variance to 9.8% (Model 2), and the full model including cultural and legal awareness variables explained 24.7% of variance, suggesting that while the Mifumi ruling timeline showed independent effects, the majority of variation in refund demands was attributable to factors other than temporal period, particularly legal awareness and patriarchal attitudes. The Hosmer-Lemeshow test indicated adequate model fit ($\chi^2$=11.28, p=0.186), and variance inflation factors below 2.8 confirmed absence of problematic multicollinearity, lending confidence to the stability of the coefficient estimates.

The pattern of associations for other predictors revealed the complex interplay of factors shaping bride price refund practices and highlighted potential mechanisms through which legal reforms might operate. Full awareness of the Mifumi ruling was associated with 57% lower odds of refund demands (OR=0.43, 95% CI: 0.29-0.64, p<0.001) compared to no awareness, representing one of the strongest protective associations in the model and suggesting that legal literacy may be a critical mediating pathway through which judicial rulings influence behavior. Tertiary education showed protective effects (OR=0.52, p=0.034), though secondary education was not significant after adjusting for legal awareness, implying that education's benefits may operate through increased exposure to legal information rather than through general cognitive or economic pathways. Conversely, higher bride price amounts were associated with 24% increased odds of refund demands per million UGX (OR=1.24, 95% CI: 1.16-1.33, p<0.001), confirming that the economic stakes involved continued to drive refund practices despite legal prohibitions.

**Table 4: Linear Mixed-Effects Model Analysis of Women's Autonomy Scores Accounting for District-Level Clustering (N=624 women)**

| **Fixed Effects** | **Coefficient (β)** | **SE** | **95% CI** | **t-value** | **p-value** |
|---|---|---|---|---|---|
| **Intercept** | 31.45 | 3.82 | (23.96, 38.94) | 8.23 | <0.001 |
| **Primary Predictor** | | | | | |
| Post-Mifumi cohort | 8.74 | 1.52 | (5.76, 11.72) | 5.75 | <0.001 |
| **Sociodemographic Factors** | | | | | |
| Age (years) | 0.12 | 0.08 | (-0.04, 0.28) | 1.50 | 0.134 |
| Education (ref: No formal) | | | | | |
| Primary | 3.21 | 1.68 | (-0.08, 6.50) | 1.91 | 0.057 |
| Secondary | 6.84 | 1.72 | (3.47, 10.21) | 3.98 | <0.001 |
| Tertiary | 11.23 | 2.14 | (7.03, 15.43) | 5.25 | <0.001 |
| Urban residence | 4.52 | 1.38 | (1.81, 7.23) | 3.28 | 0.001 |
| Household wealth quintile | 2.18 | 0.54 | (1.12, 3.24) | 4.04 | <0.001 |
| **Legal and Cultural Factors** | | | | | |
| Awareness of Mifumi ruling (ref: Not aware) | | | | | |
| Partially aware | 3.67 | 1.44 | (0.85, 6.49) | 2.55 | 0.011 |
| Fully aware | 7.92 | 1.58 | (4.82, 11.02) | 5.01 | <0.001 |
| Bride price refund demanded | -12.48 | 1.62 | (-15.66, -9.30) | -7.70 | <0.001 |
| Bride price amount (millions UGX) | -1.84 | 0.42 | (-2.66, -1.02) | -4.38 | <0.001 |
| Partner's gender equitable attitudes | 0.38 | 0.06 | (0.26, 0.50) | 6.33 | <0.001 |
| **Interaction Effects** | | | | | |
| Post-Mifumi × Awareness (full) | 5.21 | 2.08 | (1.13, 9.29) | 2.50 | 0.013 |
| Post-Mifumi × Refund demanded | -6.34 | 2.47 | (-11.18, -1.50) | -2.57 | 0.010 |
| **Random Effects** | Variance | SD | | | |
| District intercept ($\tau^2$) | 28.64 | 5.35 | | | |
| Residual ($\sigma^2$) | 186.43 | 13.65 | | | |
| **Model Fit** | | | | | |
| Intraclass Correlation (ICC) | 0.133 | | | | |
| Marginal $R^2$ | 0.384 | | | | |
| Conditional $R^2$ | 0.467 | | | | |
| AIC | 5847.3 | | | | |
| BIC | 5936.8 | | | | |

Model assumptions verified: Residuals approximately normally distributed (Shapiro-Wilk p = 0.142); homoscedasticity confirmed (Breusch-Pagan p = 0.267); random effects normally distributed (Q-Q plot inspection).

The linear mixed-effects model accounted for the hierarchical structure of the data, with women nested within districts, and revealed that post-Mifumi cohort membership was associated with an 8.74-point increase in women's autonomy scores (95% CI: 5.76-11.72, $p<0.001$) after controlling for individual-level sociodemographic factors, legal awareness, and cultural practices. This coefficient represented approximately 0.47 standard deviations on the autonomy scale and constituted a meaningful effect size, though it was smaller than the unadjusted difference observed in the bivariate analysis (10.2 points), indicating that compositional differences between cohorts—particularly education and legal awareness—explained a substantial portion of the observed autonomy improvements. The intraclass correlation coefficient of 0.133 indicated that 13.3% of variance in women's autonomy existed between districts rather than within them, justifying the mixed-effects approach and suggesting important geographic clustering in gender equity outcomes that may reflect district-level variation in traditional authority structures, local government enforcement, or civil society presence. The conditional $R^2$ of 0.467 indicated that the full model, including both fixed effects and random intercepts, explained 46.7% of variance in autonomy scores, while the marginal $R^2$ of 0.384 showed that fixed effects alone explained 38.4%, demonstrating reasonably strong explanatory power though leaving over half of variance attributable to unmeasured individual and contextual factors. Model diagnostics confirmed that key assumptions were met, with residuals approximately normally distributed (Shapiro-Wilk $p=0.142$), homoscedasticity present (Breusch-Pagan $p=0.267$), and random effects following normal distributions based on Q-Q plot inspection, lending credibility to the parameter estimates and their standard errors.

The pattern of coefficients illuminated multiple pathways through which gender equity outcomes were shaped and revealed critical moderating factors that conditioned the impact of the Mifumi ruling. Education showed a strong dose-response relationship with autonomy: compared to women with no formal education, those with secondary education scored 6.84 points higher ($p<0.001$) and those with tertiary education scored 11.23 points higher ($p<0.001$), effects that exceeded the magnitude of the cohort effect and highlighted education as perhaps the most potent determinant of women's agency (Albert et al., 2024; Bracho-Amador et al., 2023; Tight, 2020). These interactions complicated any simple narrative of legal impact and suggested that the Mifumi ruling's effects were highly heterogeneous, benefiting primarily those women who were aware of their rights and residing in contexts where the prohibited practice had actually ceased, while potentially leaving behind or even exacerbating the disadvantage of those who remained subject to refund demands despite the legal prohibition (Howlin, 2018). The persistence of substantial unexplained variance and the large magnitude of coefficients for factors like education, refund demands, and partner attitudes relative to the cohort effect itself challenged assumptions about law as the primary driver of social change and pointed instead toward a complex web of educational, economic, and ideological factors that mediated and moderated whatever independent influence the judicial ruling exerted on gender relations in Ugandan communities.

## CONCLUSION

This longitudinal analysis of the Mifumi v. Attorney General ruling's impact on gender equity and justice in Uganda revealed a complex narrative of partial progress constrained by persistent structural and cultural barriers, directly addressing the study's three specific objectives through comprehensive empirical evidence. Regarding the first objective—assessing the extent to which the ruling transformed marriage practices and bride price negotiations—the study demonstrated that while bride price refund demands decreased significantly from 30.1% to 20.0% in post-Mifumi marriages ($p<0.001$), the practice persisted in one-fifth of recent marriages, and bride price amounts actually increased rather than diminished (UGX 3.9 to 5.7 million, $p<0.001$). This indicated that the ruling achieved partial compliance with its specific prohibition on refunds but failed to fundamentally alter the commodification of women through bride price transactions. For the second objective—examining mechanisms through which customary law undermined constitutional protections—the multivariate analyses revealed that patriarchal attitudes (OR=1.31 per 10-point increase, $p<0.001$), low legal awareness (only 35% fully aware of the ruling), regional variation in traditional authority strength (Northern region OR=1.68, $p=0.012$), and the economic incentives embedded in high bride price amounts (OR=1.24 per million UGX, $p<0.001$) constituted the primary mechanisms perpetuating harmful practices despite progressive judicial pronouncements. The third objective—identifying barriers preventing translation of formal legal victories into substantive justice—was addressed through findings that educational disparities, geographic clustering of gender inequitable practices (ICC=0.133), and the limited reach of legal literacy programs created an implementation gap wherein legal reforms benefited primarily educated, aware, urban women while leaving rural, less-educated women vulnerable to continued discrimination, with women subjected to refund demands experiencing 12.48-point lower autonomy scores ($p<0.001$) even in the post-Mifumi era.

## RECOMMENDATIONS

The government of Uganda, through the Ministry of Justice and Constitutional Affairs in partnership with civil society organizations, should establish a nationwide legal literacy campaign specifically targeting rural communities where awareness of the Mifumi ruling remained below 25%.

Development partners and government agencies should prioritize interventions that directly challenge patriarchal ideologies, which showed the strongest associations with harmful practices and mediated the persistence of gender inequitable behaviors despite legal reforms.

The Uganda Law Society, in collaboration with local governments and the Judiciary, should establish accessible legal aid clinics in all districts with specific mandates to support women experiencing bride price refund demands, provide free legal representation for

enforcement of the Mifumi ruling, document violations for strategic litigation, and coordinate with local council courts to ensure compliance with constitutional provisions.

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