

Police Mystique: Policing and Extrajudicial Killings by the Police in Kenya and a Call for JusticeJohnson Nduya Muthama
Arden University, Kenya

Abstract. The police have a responsibility for the maintenance of law and order in order to protect lives and properties. However, in several instances, the police have been inadvertently mentioned in criminal activities, and at times, the State, through the police, has been accused of extrajudicial killings. This study investigated the extent to which the Kenya police have been involved in extrajudicial killings using the control balance theory. This was done through purposeful sampling and snowballing of former police officers, human rights lawyers, and human rights activists. The study concludes that although there is no substantive evidence indicating that the police killed anyone, there were several instances where the police could have been involved in the killings and/or cover-up of murder. It is recommended that the police be re-oriented on law enforcement procedures, constitutional, and human rights laws.

Keywords: Police and policing, extrajudicial killings, crime and justice

Background of the Study

The POLICE is an acronym for Public Officers of Law, Intelligence, Crime and Emergency. The purpose of the police is to enforce the law and detect and prevent crime to ensure the safety and security of all citizens (Bradford & Loader, 2016). In that case, their lawful powers include arrest and use of minimal force as legitimised by the State in the Kenyan Constitution (Republic of Kenya, 2010; 2011; 2012). However, several studies have established that the police operate in an environment shrouded by power and mystery and often go way beyond their mandate and, unfortunately, harm both citizens and criminal culprits (Bailey & Peterson, 1994; Bouza, 2013; Ruteere, 2011; William, 2018), and sometimes self and others (Wango, Wairire & Odiemo, 2018) in the course of their duties including engaging in extrajudicial killings (Human Rights Watch, 2019; Kenya National Commission on Human Rights, 2008).

Extrajudicial killings refer to the killing of a people by governmental authorities or agents without sanctioning any judicial proceedings and hence involve the illegal use of force (Van, Stalele, 2020; William, 2018). William (2018: 118) argues that extrajudicial killings include the execution of political prisoners, murder of civilians and concludes:

There are, of course, some instances when death does not rise to the level of unlawful killing. Nevertheless, these deaths are not lawful. They are inhumane, unnecessary, and illegitimate. This is because they fail to comply with basic principles of humanity and offer no due process to victims-no opportunity to defend themselves through the rule of law. Because of this, extrajudicial killings represent an arbitrary deprivation of life.

The Kenya National Commission on Human Rights (2008) indicated that the Kenya police could have been complicit in extrajudicial executions of an estimated 500 people between June and October 2007 and that the bodies were deposited in various mortuaries in the country, while some were left in the wilderness. Others were dumped in isolated forests, desolate farms, rivers, and dams. The police rejoinder to the report did not deny the fact of the deaths but merely stated that inquest files had been opened.

The history of policing in British East Africa Protectorate (later independence Kenya) began in 1896 (Hans-Martin, 2007) after Kenya was proclaimed a British Protectorate in 1895. The purpose was to protect the trading routes, centres, stocks and stations (Hans-Martin, 2007). In 1906, the Kenya police force was established by a police ordinance, and the aim was to

ensure colonial security. The modern Kenya Police was founded in 1920, and Africans were recruited at lower ranks of the force. The British colonialists needed a police force that would perform two purposes: (1) to force the natives into submission; and (2) to quench any would-be resistance to colonial rule. Subsequently, the police officers and other administrative officers in charge of various regions were trained to adhere to these regulations. Extrajudicial killings started in 1953 when the British were required to deal with the native rebellion against colonial rule, especially the Mau Mau rebellion (Anderson, 2002; Maina wa Kinyatti, 1987; 2016). Kenya gained independence from the British in 1963. Subsequently, the successful governments turned to the use of force to assert themselves on the general population and ensure obedience and adherence to the law. This is summarised by Otiso and Kaguta (2016: 221) as follows:

Continuities from colonial government into the Kenyatta government were not only reflected in the leadership, but they transcended the institution of the police as a whole. The independent government inherited a police force from the former colonial government comprising the same structure and composition and, to a large extent, the same objectives and modus operandi, namely to protect the administration's interest.

Policing and police brutality has been an ongoing phenomenon in Kenya since the colonial era when the then colonial administration used the police to quench the native resistance to British rule (Kivoi, 2020; Kivoi & Mbae, 2013; Maina wa Kinyatti, 1987; Njoki & Gachihi, 2020; Ruteere, 2011). Since the country gained independence, successive governments have tended to use the police in similar ways to perpetuate the status quo including corrupt activities (Hope, 2019; Kivoi, 2020; Ruteere, 2011; Thomassen 2013). Several studies have argued that the government of the first president in independent Kenya, Jomo Kenyatta (1963 to 1978), perpetuated several crimes using the police, and this further escalated during the reign of the second president, Daniel Moi (1978 to 2002) (Hope, 2019; Mathenge, 2020; Muthama, 2015; Njoki & Gachihi, 2020). Muthama (2015: 84) summarises the situation in Kenya as follows:

Today, Kenyans are not confident about the security of their children and community. As a result, stability and progress have taken a back seat. People cannot develop in a state of insecurity. A crime impairs the overall development of nations, undermines spiritual and material well-being, compromises human dignity and creates a climate of fear and violence, which endangers personal security and erodes the quality of life.

Furthermore, the police are accused of killing criminal suspects, particularly in informal urban settlements (Human Rights Watch, 2021; Van Stapele, 2016; 2020).

The reasons why police are involved in extrajudicial killings have been argued to be both political killings and 'State sanctioned' such as in the fight against terrorism (Chome, 2019; Human Rights Watch, 2019; MUHURI, 2015; Ombati, 2016; Osen, 2022). The terrorist factor has been attributed to several killings by the anti-terrorist unit, with human rights groups and others calling for more investigations and a greater enactment of the justice and legal systems (Kenya National Commission on Human Rights, 2008; Osen, 2022; Otieno, 2020a; 2020b). It is also argued that the 'terrorist-led' killings could have been carried out in a bid to protect Kenyans and others from possible retaliation attacks from would-be extremist radicalisation and terrorist attacks.

The literature on police involvement in crime affirms that the police in Kenya are actively involved in various types of murders, homicides and capital punishments (Bailey & Peterson, 1994; Kenya National Commission on Human Rights, 2008). Reports by the Kenya National Commission on Human Rights (2008), HAKI Africa (2016), and others argue that the police were responsible for the murder of 157 Kenyans in 2020, while Osen (2022) stated that police killed 114 people in 2021. In the stated killings, 10 people disappeared while under police custody while a plethora of others disappeared in informal urban settlements, a scenario that

has made young people in informal urban settlements demand an end to the reign of terror inflicted on them by the authorities (Amnesty Kenya, 2021; Mwangi, 2019; Van Stapele, 2020).

It is both controversial and difficult to assert that the police, as State Officers, are involved in extrajudicial killings (Njoroge, 2018; Obadha, 2018). This is because there are no apparent records to indicate with utmost precision that the reported killings were carried out by the police and hence either sanctioned by the police or part of police activities. Nonetheless, there are several incidents in which the police have been clearly cited as directly involved in several deaths (Human Rights Watch, 2018; 2019; Ombati, 2016; Osen, 2022). This implies that accounts of police involvement and complicity in certain dreadful acts cannot be wholly ignored or side-lined (Ruteere, 2011). Furthermore, the law affords police officers unique responsibilities and rights (Hougland & Allen, 2015; Republic of Kenya, 2010; 2011; 2012). The police, as law enforcement agents, also enjoy the legal authority and access to weapons, a privilege deprived of ordinary citizens (Stinson, Liederbach & Brewer, 2016; Ruteere, 2011). What further complicates police adherence to the law is that police officers are primarily exempted from law enforcement because fellow officers find it hard to apply the law to their counterparts. In Kenya, this has primarily been addressed through several police reformers as stipulated in the Constitution (Andvig & Barasa, 2011; Osse, 2016; Republic of Kenya, 2009; 2015). However, police brutality appears to signify a growing trend (Kivoi, 2020; Osen, 2022; Ruteere, 2011). Besides, Kenya has faced a backlash from the international community for extrajudicial killing cases, some documented by human rights groups (Obadha, 2018).

Bailey and Peterson (1994) assert that there are several instances of police involvement in various types of crime, including murders, homicides, and 'capital punishments.' Capital punishment is legal and is often subjected to sentenced offenders for involvement in serious crimes (Bailey & Peterson, 1994; Hood, 2001; Republic of Kenya, 2010; 2012). The police involvement in extrajudicial killings is aimed at crime deterrence (Bailey & Peterson, 1994; Osse, 2016). In Goldschmidt and Anonymous (2008) conception, the motivation for using extra-legal means and dishonesty was to further the law enforcement function. In Kenya, for instance, the police were responsible for the murder of over 142 people in 2020 alone, which only accounted for the documented cases (Kenya National Commission on Human Rights, 2008; Kiprono, 2021; Voanews, 2020a, 2020b). Kiprono (2021) summarises it thus:

In the Kenyan context, these violations involve systemic police abuses, summary executions, enforced disappearances, missing persons and incidences of torture that have been epitomised by the abduction, torture, killing and enforced disappearance.

Police are said to have been responsible for the murder of 11 people during the first ten days of the dusk-to-dawn curfew enforced due to COVID-19 protocols (Human Rights Watch, 2021; Kenya Human Rights Commission, 2021; Kivoi, 2020). This led to the much-publicised death of two brothers while in police custody (Warah, 2021). In addition, ten people were said to have disappeared while under police custody in informal urban settlements and the Coast region, a scenario that has been driving the youth and other human activists to demand an end to the reign of terror inflicted by the authorities (Chome, 2019; MUHURI, 2015; Ombati, 2016; Otieno, 2020a; Smith, 2012). There are also the alleged killings and disappearance of 81 people in the Coast region in five years (HAKI Africa, 2016), the alleged killing of a lawyer named Willie Kimani and two other people (Ombati, 2016). Kenya recorded 43 cases between January and November 2021, while the Coast region had the highest number of 29, and all these people are said to have been killed or mysteriously disappeared (Praxides, 2021). Protection International (2020), together with eleven (11) other organisations, cited 107 Kenyans killed by the police in 2019 and recommended the following: implementation of the National Coroner's Act and Prevention of Torture Act; establishment of a National Commission of inquiry into violations by security agents; the granting of reparations for victims and families

of extrajudicial killings and enforced disappearances; and, condemnation of police excesses by the national government.

Human rights activists and scholars are concerned with the worrying trends in which crime is associated with imaginary narratives that ‘ghetto’ (informal urban settlements) young males were merely thugs, a condition imposed on them owing to the poor living conditions and hardships associated with living in informal settlements (Chambliss, 1994; Human Rights Watch, 2019; Njoki & Gachihi, 2020; Otieno & Akeyo, 2018; Van Stapele, 2020). In Kenya, the civil society and human rights activists argue that police often kidnap and execute individuals without justification for being criminals. The Human Rights Watch report (2019) noted that police had killed no fewer than 21 males in Nairobi’s low-income areas, apparently claiming that they were criminals. The Human Rights Watch reports (2018; 2019) and the Kenya Human Rights Commission (2021) noted that police had killed no fewer than 21 males in Nairobi’s low-income areas neighbourhoods such as Mathare, Dandora and Majengo (informal urban settlements or ‘slums’), apparently claiming that they were criminals. Otieno and Akeyo (2018) reported that police executed 17 people within seven days within the Dandora, Mathare, and Majengo areas of Nairobi, causing public outrage. Goldschmidt and Anonymous (2008) unveiled a firm belief in the use of extra-legal approaches because of the perception that they effectively helped counter criminal behaviour. Besides, even in the cases where the authorities abducted suspects, the law dictates that crime suspects be presented to courts of law for trial (Republic of Kenya, 2010, 2011; 2012). Thus, only individuals found guilty of what they were accused of can be punished depending on the nature of the crime committed and its severity. All in all, police involvement in extrajudicial killings is worrisome since it threatens and adds to the existing insecurity rather than promoting peace and the rule of law (Muthama, 2022).

Theoretical Framework

The study adopted the control balance theory (Braithwaite, 1997; Brown, Esbensen, & Geis, 2010; Cote, 2002; Delisi & Hochstetler, 2002; Repko & Szostak, 2017; Tittle, 1995; Williams, 2008). Control balance theory postulates that people have control over their actions and are also actively controlled by others (Braithwaite, 1997). Tittle (1995) describes this relationship as a ‘control ratio’. This “control ratio” can be either balanced (controlled) or unbalanced (uncontrolled). For Tittle, the type of imbalance affects the specific expression of the deviance it causes. This relationship between actively exercised and self-experienced control was significant in that if the police commit murder, it is at an individual level, while if the same action is sanctioned by the State, it leads to extrajudicial killing (Muthama, 2022). This is illustrated as follows:

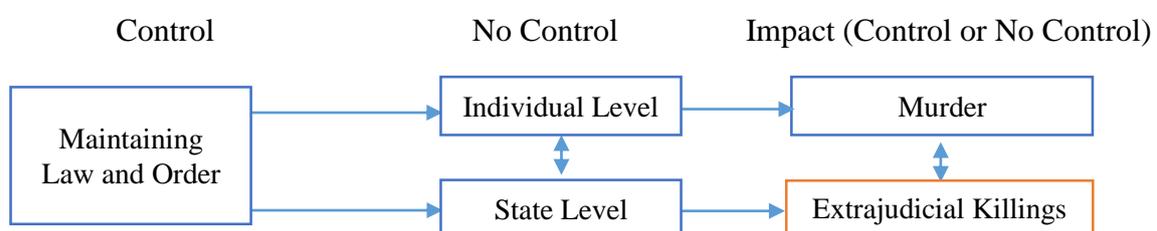


Figure 1. Police Control and Involvement in Crime

The control balance model demonstrates the maintenance of law and order in terms of the individual and the state. This is either controlled or uncontrolled leading to deviant behaviour. In that case, individuals tend to be controlled, but when they engage in autonomous forms of crime, this is termed murder. However, there are certain crimes that are of a more

indirect nature rather than involving the individual, and hence these are regarded as extrajudicial killings.

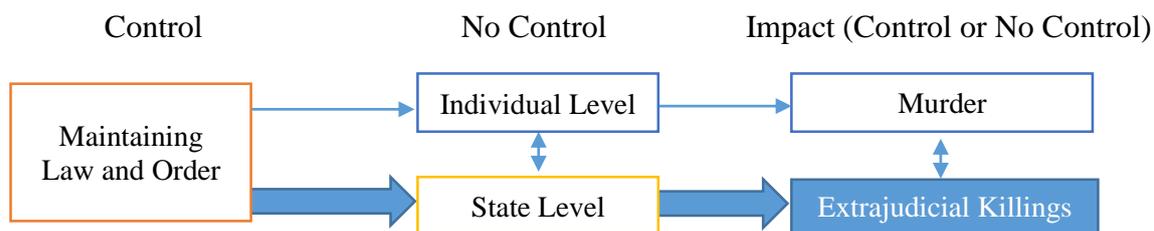


Figure 2. Police Control and Involvement in Extrajudicial Killings

Once, again, police control or lack of it can and has an impact on policing (at the individual level can lead to murder, and at the state level can cause extrajudicial killings). According to control balance theory, all groups must be targeted, and hence the focus is on both the police as individuals and as State agents. Therefore, police officers as individuals are expected to experience more control than they exercise, while control deficit by the State leads to criminal acts termed extrajudicial killings.

Philosophical Assumptions and Research Design

The study adopted a descriptive survey research design to enable the collection of data concerning extrajudicial killings among the police, the subject of study (Bell & Waters, 2014; British Psychological Society, 2021; Creswell, 2002; Dawson, 2009; Leedy & Ormrod, 2015; Walliman, 2010). Throughout the study, it was apparent that Kenyan police officers would hesitate to cooperate because the study negatively implicated them (Muthama, 2022). Another concept of the study is the high level of secrecy adopted by police officers that hinders gathering data on police and other government agencies. The study had to contend with the issue of who would provide relevant and reliable information about police officers and their involvement in extrajudicial killings. Ideally, the poor relationship between members of the public and police officers can push people to give false information about the authorities owing to the notion held about the police and their perceived dishonest dealings by members of the public. However, relying on human rights lawyers, retired police officers and members of the civil society (human rights lawyers and human rights activists) lowered the chances of gathering false information for the purpose of the study (Muthama, 2022).

Sampling and Data Collection

The research was conducted from 16th December 2021 to 5th January 2022. A total of 26 participants took part in the study and comprised of the following: 15 retired (former) police officers (both male and females); 6 human rights activists; and, 5 human rights lawyers. Data was collected using a semi-structured research questionnaire and a focused group discussion. Afolayan and Oniyinde's (2019) back questionnaires as an effective research method because the researcher can engage in selective borrowing and use all the information gathered pertaining to the subject. Nonetheless, extrajudicial killings are highly concealed by the authorities. Thus, conducting extensive scholarly research and relying on a semi-structured questionnaire to inform the subject is cognizant because it offers an in-depth perspective on the inquiry. Data collection involved filling in the questionnaire that provided details including gender, age, education, religion, working organisation, and working status (Franfort-Nachmias, Nachmias, & DeWaard, 1996; Leedy & Ormrod, 2015; McMillan, 2011). This was because, due to the sensitivity of the information, most participants, especially the retired police officers, were categorical that they should not be recorded, while the civil society members were

categorical that what they said was 'factual' and that they could be recorded and their names cited. Additional data was collected from secondary sources, including journals, books newspaper articles, among other credible sources of information.

Results

Interestingly, all the retired police officers gave short responses and were also hesitant to participate in the study despite all the assurance and reassurance of confidentiality, research permit and all, while the civil society members were willing to be recorded and even gave detailed cases. Indeed, the participants from the civil society were highly enthusiastic about the study and demanded that the researcher records their names and take note of persons who had been killed or disappeared (cases and references) though this was way beyond the scope of the study (Muthama, 2022).

Table 1. Characteristics of Research Participants

		Number	Percentage
Gender	Male	9	35%
	Female	17	65%
	Total	26	100%
Age	35 – 44 years	4	15.4%
	45 – 54 years	5	19.2%
	55 years and above	17	65.4%
	Total	26	100%
Religion	Christian	20	77%
	Muslim	5	19%
	Hindu	1	4%
	Total	26	100.0%
Level of Education	Primary Level	7	27%
	Secondary Level	8	31%
	Tertiary Level	6	23%
	Postgraduate	5	19%
	Total	26	100%
Working Organization	Police (retired)	15	58%
	Human rights lawyers	5	19%
	Human rights activists	6	23%
	Total	26	100%

The police service has a significantly greater number of male officers as a reflection of the colonial era in which the force aimed at dominance in the larger patriarchal Kenyan society. A majority (65 %) of the participants were male, while the rest (35%) were female. Though an almost equal number of police officers were selected (eight males and seven females), the civil society lacked female participants, or they were unwilling due to security reasons. Amidst this, the researcher did not want to force anyone in order to reduce unnecessary risk. Most of the participants (65 %) were over 55 years since they were principally selected from retired police officers (there were 15 retired police officers and two civil rights activists who were above 55 years). The human activists were either on contract-based employment or were fully employed, while the lawyers were either self-employed or worked on temporary employment for human rights organizations. A majority of the participants were Christians (77%), though there were other religious faiths such as Muslim (19%) and Hindu (4%). This was important because Kenyans traditionally are convinced that they will tell the truth if one is religious, which was

important in this study. In addition, there are various trends with increased contestations of religion and politics as allegations of Muslim activism (Chome, 2019) leading to several allegations of Muslims being particularly targeted in extrajudicial killings, especially in the Coast region (HAKI Africa, 2016; Otieno, 2020a; Smith, 2012). Hence, their involvement in the research was paramount. The participants were requested to indicate their highest educational level, and it was noted that most of the participants (58%) had minimum secondary education (primary 27% and secondary 31%) since they were formerly police officers, while a significant others (23%) tertiary level of education (diploma, degree) though a few (19%) had postgraduate level of education. This depicts that most of the participants had some form of education and thus could provide reliable information about extrajudicial killings. However, the minimum police qualification of primary and later secondary level education could imply that the police officers could have missed out on additional information on issues such as the Constitution, human rights, and other relevant laws.

Police Involvement in Extrajudicial Killings

The retired police officers and the civil society group members differed in their responses to extrajudicial killings by the police. It was notable that while the female police officers insisted that the police were only involved in what they called 'regular duties,' the male officers admitted that the police could have been involved in extrajudicial killings. The officers insisted that police often 'went out of their way in their duties to deal with some of the hardened criminals and terrorists.' However, when asked if this meant killing or 'eliminating' the suspect, the officers retracted the statement and said, 'they did not want to be quoted.' The female police officers insisted that there were incidents in which the police had to be, in her words, "ruthless and deal with some of these people. Like the gangsters and terrorists. Those require special measures." A retired female officer said about criminals, "you don't waste time talking to a criminal. *Unamaliza hao*" (you finish them, implying they should be eliminated from society). Asked to clarify, she said, "What I have said is enough!" The civil society groups and lawyers were categorical that police were involved in extrajudicial killings, and they cited the names of several police officers, their rank, and their respective police stations.

Table 2. Interview Statistics for Research Participants

No.	Questions	Response				Total
		Agree (Yes)	Not sure	Disagree	Prefer not to answer	
1.	Did British colonialists who formed the first police force in Kenya train the police, directly or indirectly, to execute extrajudicial killings?	23	3	-	-	26
2.	Did the colonialists introduce extrajudicial killings?	22	2	2	-	26
3.	Are extrajudicial killings an inherited culture among the police?	20	3	3	-	26
4.	Where would you trace the extrajudicial killings:					
a)	Before independence	21	3	-	2	26
b)	After independence		2	20	4	26
c)	Both before and after independence	18	3		5	26

5.	In your opinion, are police involved in unfair practices that are tantamount to abuse of power, including extrajudicial killings?	11	3	2	10	26
6.	Are police trained to conduct extrajudicial killings?	11	2	2	11	26
7.	Do police engage in extrajudicial killings?	11	4	3	8	26
8.	Are the police fulfilling instructions or doing their work as police officers and acting on their own?					
a)	Acting on their own	12	3	3	8	26
b)	Fulfilling instructions from above	14	4	3	5	26
9.	Does the training of the Kenya Police include human rights and how to handle citizens (both victims and culprits)?	3	7	11	5	26

The table reveals a lot of important details as follows:

1. It was evident that the colonial administration could have instigated several killings, as evident in numbers 1, 2, 3 and 4. Whether this could have continued after independence was more highly contested, as evident in numbers 5 to 9.
2. The members of civil society (human rights activists and human lawyers) were categorical that the police were involved and conducted extrajudicial killings, as evident in numbers 5, 6, 7, 8 and 9. However, the retired police officers kept away from this sensitive topic and vastly preferred not to answer whether or not the police were involved in extrajudicial killings, as evident in numbers 5, 6, 7, 8 and 9.
3. It was notable that the police were not trained on human rights and enhanced police citizens' relations; thus, they may not have been aware that they were oftentimes infringing on the rights of citizens in their interpretation of duties and responsibilities, as inherent in the colonial policing culture.

The civil society and human activists argued that the police service (formerly force) was established by the colonial administration and later used by the new African elites to force people into submission, and hence the police could either have been acting on their own or with instructions from above as "extrajudicial killings is part of policing." Therefore, police killings were part of their duties and responsibilities.

A member of the civil society summarised it all:

The police stations were set up by the colonial administration to force Africans into submission. Every police station has a killer squad. This is to force people to submit and obey the authorities.

From the findings, it was evident that there were several instances that could lead to killings by the police as follows:

1. Terrorism. This could involve the police or the anti-terrorist squad. A participant from the civil society said, 'When these guys (meaning police) shoot you, that is it. Period.' This is also outlined in several reports, including the HAKI Africa (2016:5) that argues that "likely perpetrators are officers from counterterrorism or other specialised police units."
2. Politics and political demonstration to force obedience. A participant involved in human rights and politics said, 'The police tell you there is no meeting and you should go home. You either go, or you die.' This was noted in the Human Rights Watch (2018) report that

argued police killed at least 23 people, most of them opposition supporters. A human rights activist said, *'In Kenya, you don't argue with the government of the day. They will kill you; mark my words!'*

3. Crime and 'criminals.' The police were said to be working out ways to stop crime. The participants, both retired police and members of civil society, argued that so many criminals were killed by the police. One summarised it thus, *'Look, the police was set up to protect the rich. Criminals are shot left, right and centre. I mean, who does not know this.'* Another one added, *'Police are convinced that keeping law and order involves killing criminals. That is part of their training.'* A retired police officer summed it up by stating, *'Look, these are criminals. What do you want us to do with them? You take them to court, and the next day, they are on the streets. Just shoot them!'*
4. Other reasons. These could range from criminal deals gone sour to revenge and other unexplained reasons. A lawyer said, *'Police kill all the time. It does not matter if you are a criminal, have personal issues or if they were sent to kill you. We have so many cases of police killings sometimes we don't know where to start.'*

The study asked the participants how many people could have been killed by the police, and there were variations of 100 to 120 in 2021. Some of the participants claimed, "There are so many deaths, unaccountable." The HAKI Africa (2016:5-6) report, for instance, stated that there were 81 killings in the Coastal region of Kenya between 2012 and November 2016 as follows: 22 as a result of excessive force during policing operations; 4 in police custody; 31 extrajudicial executions; and, 24 enforced disappearances. The 81 cases are documented in their report (HAKI Africa, 2016:32 - 44). There appeared to be overwhelming evidence that the police did kill people, but if these were extrajudicial killings was difficult to establish with utmost accuracy since the police themselves argued that the killings could have been 'justified.' Also, there was an apparent discrepancy between the police and the public summarised by one of the participants as follows:

The police are not part of the people. You hear people saying 'tulikutana na mtu moja na askari wawili' (we met with one person and two police officers).

Indeed, the HAKI Africa (2016:3) noted that 'some cases of unlawful killing and enforced disappearance go unreported due to families fear of reprisals from State security forces and the stigmatising effect of it being known a relative has been targeted by police.'

Reasons why Police are Involved in Extrajudicial Killings

A significant question in this study was why police would have been involved in extrajudicial killings. Once again, the retired police officers argued that police have the powers to shoot criminals and other suspects who refused to surrender or challenged the police using firearms. While this was not being challenged, the study sought to know the relationship, if any, between extrajudicial killings and crime. The lawyers and civil society members were able to delineate crime from extrajudicial killings as outlined by one of them:

There is no relationship whatsoever between extrajudicial killings and crime. If you look at the crime trends in Kenya or Nairobi in particular, there are crimes in all of Nairobi's urban centres. But the extrajudicial killings are confined to the informal urban settlements.

This was in conformity with several media reports on the killings of young people in informal urban settlements by police officers (Mathenge, 2020; Ombati, 2016; Otieno, 2020a, 2020b). Civil society and lawyers called it the 'criminalisation of poverty' (Njoki & Gachihi, 2020). The civil society argued that the young people killed in informal urban settlements could have been criminals, as stated by the police, but 'were killed in deals gone sour.'

The civil organisations took this discussion further, and one of them narrated a case study in which a particular gun wrapped in a plastic bag was displayed at several crime scenes where

several 'gangsters' were shot dead (claimed 10 in number). He went on to state that in a Press Conference, the human activists and lawyers questioned the integrity of this 'same gun appearing to be used in every other crime.' The 'gun' was subsequently withdrawn. Two other cases involved a young man shot in possession of a toy gun and another who had a plastic gun. In both cases, the police claimed there was a shootout with the criminals, and as a result, the 'armed criminals' were shot dead.

The human lawyer reasoned:

How did any of these young men alone engage the police with a toy gun or a plastic gun? These police officers have no regard for the law. We have even filed these cases in court, and they have refused completely to respond to our inquiry. They simply shot the young men and many others. Who can ask them? To whom are they accountable?

It would appear that the issue of extrajudicial killings has greater amplification of both police brutality and impunity. One of the activists gave two examples of police brutality in enforcing the COVID-19 restrictions:

The police beat all people, including women and children and persons with disability. The police claim that they are enforcing curfew and that they were acting in self-defence in all the incidents. The person has a physical disability and hence cannot, could not, would never have provoked the police. The most puzzling are the children – surely how could they violate laws to the point of death?. The use of unreasonable force is uncalled for. In fact, one of the children, a small boy (aged 13 years), was shot by the police on the balcony of a house. Now take down these statistics. The police who shot the boy were eleven (11) of them, and the person with a disability involved eight (8) police officers. These are trigger happy characters who have no regard for the law.

It would have been very prudent to follow up on such cases with the police to verify the authenticity of these claims, although the civil society had case file numbers and 'supporting evidence.' The HAKI Africa (2016:3) report argued that most of the victims of extrajudicial killings by the police in the Coastal region “are youths, there are also Sheikhs, Imams and Preachers some of them over 50 years old. Examples of the same are found in other reports (Otieno, 2020a, 2020b; Smith, 2012). The Human Rights Watch Report (2019) noted in March 2017, the community organisations in Mathare documented police killings of 57 men and women in one year, allegedly for links to crime. Protection International (2020) noted that a majority of the 107 people killed by police officers in 2019 happened in Nairobi and that the youth are the most likely to be killed by police officers. Overall, there appeared to be three clear categories and an additional seemingly 'multiple' purposes of persons likely to be killed by the police, as outlined in Table 3.

Table 3. Categories of Persons likely to be victims of police extrajudicial killings

Order of Priority	Crime / Offence / Claim	Characteristics
1.	Terrorism	- Often young people in informal urban settlements - Persons with radical ideas
2.	Politics and political demonstrations	- Politicians who have run out of favour with the government, - Civil society and other demonstrators against the government
3.	Criminals	- Young people - Young people in informal urban settlements
4.	Other persons	- Persons falling out of favour with police officers. These include human rights activists and, lawyers, members of civil society with divergent views from the government.

While it is acceptable that these persons may not necessarily be victims of police killings, it is imperative that the police exempt themselves from blame by adhering to the rule of law.

Intervention Strategies to Prevent and Curb Extrajudicial Killings

It appears that there is much more than one would expect since extrajudicial killings were far more extensive and complex than anticipated. For example, since the civil societies and human rights activists argued that they were aware of the killings, it was imperative that they, in turn, identify ways of curbing the killing through strict adherence to the law. However, the retired police officers who participated in the study were categorical that there was not as much to discuss the killing since, as they argued, and in the words of several of them, 'these were criminals.' Nonetheless, the issue took a different turn when the civil society argued that the police killings were not only orchestrated by the police, but there was a massive cover-up, especially by the police, to avoid detection, investigation, and justice. A member of civil society outlined the process as follows:

When the police have an operation, they obtain other members from several security forces and from other police stations. This is a highly guarded secret. So if it is during demonstrations or political rallies, you find that the officers cannot be identified by anyone within the vicinity since they are not the regular police. So, even when the police kill someone, the officer is unknown, and the people and civil rights organisations cannot pinpoint the police officer since he does not technically exist.

Another participant added:

During these operations, the police cover their faces with masks and helmets. It is therefore difficult to trace the officer responsible for the crime.

This was again traced to the colonial administration as outlined by one of the research participants:

These police tactics originated in the colonial period. The British did not post local native police officers among their ethnic groups. No. Never. That way, the native police officers detested the locals and dealt with them ruthlessly. This colonial legacy was perpetuated by Kenyatta (first president) and Moi (second president) to force people to submit to their rule under the one-party system.

Therefore, it was evident that there was a need to overhaul the overall judicial system and national police service, including training and re-training of police officers on aspects such as human rights.

Discussion

Extrajudicial killings are a major violation of human rights, especially considering that Kenya is a signatory to several international conventions and has a Constitution (Amnesty International, 2013; Amnesty Kenya, 2021; Republic of Kenya, 2010) that incorporates the Bill of Rights. This study results highlight incidents and aspects in which the police could have aimed at law enforcement. However, the enthusiasm may have consciously or unconsciously led to increased violation of human rights and, unfortunately, leading to loss of life through extrajudicial killings. Whether these extrajudicial killings are systematic or otherwise must have ultimately led to a state of insecurity and hence is, criminal since the law must be enforced with moral and empirical facts.

The history of the police under British colonial rule, in which natives were killed indiscriminately by the police, has inadvertently led to the conviction that the police are often used by the existing authorities to deal with persons who are opposed to the 'rule of law' and the existing 'ruling system.' The rise in terrorism in the World and in Kenya especially following the invasion of Somalia by Kenyan armed forces, creates a motivation for the Kenyan security forces to deal ruthlessly and forcefully with radicalisation and terrorism. A member of

the civil society summarised it thus, *“most of these young people are categorised as terrorists and highly dangerous. They are just shot.”* Another insisted that these young males are only in informal urban settlements, *“all these young men shot and killed by the police are from informal urban settlements. They have nothing, they are poor, and their families have no means to seek justice. They just disappear.”* This is linked to reports that argue that police violence and crime appear to carry poverty overtones (Njoki & Gachihi, 2020; Van Stapele, 2016; 2020). This could explain the terrorism link to several deaths and the enforced disappearances of people with radical ideas.

There were several deaths that could be attributed to and defined as extrajudicial killings. Firstly, there were various incidents in which the police used excessive force, leading to the death of their victims while in police custody. Secondly, there were several instances when people had died, and there were claims that the people had been picked by the police. Thirdly, certain people had disappeared without a trace, only for the body to be found, while in other instances, the body was never traced. Then, in several cases where police or persons said to be police officers had dropped the corpses at the mortuary. All these issues were shrouded in utter mystery. Members of civil society summarised the wordings found in the media, *“an identified body of a person of African descent has been found in such a place or mortuary.”* Another added that the media and police report that, *“an unidentified gangster has been shot by the police in an attempted crime.”* These instances were seen and perceived as incidents that proved that the police were involved in extrajudicial killings.

There was overwhelming evidence that the police could have been involved in extrajudicial killings. Members of the civil society even questioned the media reports and argued that *“there is what is in the media and what is on the ground,”* while lawyers added, *“there is massive police torture including killings and disappearances, and these are not reported by anyone including the media.”* The lawyer summarised it thus, *“there are the victims, families and statistics. Families are psychologically disturbed and tormented because they don’t know what to do.”* This could have arisen from certain officers taking the law into their hands or being overenthusiastic to maintain law and order in what was perceived as ways to control crime and terrorism.

The question of whether police are involved in extrajudicial killings can best be summarised in the words and tone of human activists and lawyers who argued as follows:

Police are involved in two ways, one, in actual killings and/or in failing to investigate the killings. This is the reason why the police are either involved or appear to be supporting the vice by refusing to investigate and bring the perpetrators to book!

Evidently, the police were either 'killing' or 'eliminating' certain groups of people perceived to be enemies of the State or people, or the police were not as enthusiastic about finding out what happened to people who disappeared, were found dead or what caused their death. There could also be wayward police officers in the national police service and some require psychological interventions in form of counselling (Wango, 2015; Wango, Wairire & Odiemo, 2018). Indeed, some of these murders and disappearances were linked to bodies found in the mortuary, where it was alleged that they were brought by the police or persons who claimed to be police officers. The civil societies argued that they had made several follow-ups and verified that the bodies were indeed brought by the police. However, upon further inquiry, the police claimed that they were called to pick up the body, and in their own words, 'we simply picked up the body.' This was obviously part of their work. Nonetheless, why the police never investigate these 'murders' is as puzzling as the murders (Muthama, 2022).

In line with the legal framework and the theoretical approach adopted in the study, there was a legal system for dealing with any would-be criminals, as outlined in Figure 3.

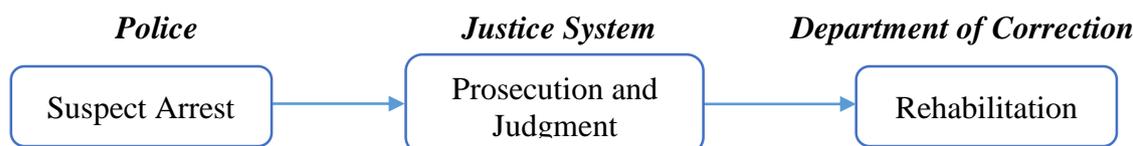


Figure 3. The Kenyan Legal System

The legal system appeared clearly outlined in which the role of the police was to arrest the suspect, and the justice system would procedurally be followed. However, it appeared that the police had usurped certain roles in the justice system and taken up the justice role and thus adopted extrajudicial killings. The new or assumed role of police officers arising out of Figure 3 is outlined in Figure 4.



Figure 4. Police Extrajudicial Killings

As illustrated in Figures 3 and 4, there is a need to restore the legal justice system as recommended by various participants outline in Figure 5. This can be summarised as follows:

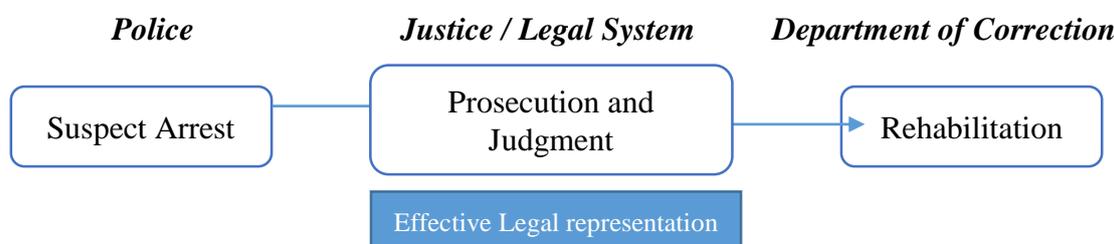


Figure 5. The Improved Justice and Legal System

Studies like this and others on enhanced safety through the prevention of crime require to be carried out in order to enhance safety and security while at the same time maintaining the rule of law (Kenya Human Rights Commission, 2021), including by the police.

Conclusion

This study established that there are instances in which the police could have been involved in the death or disappearance of certain people leading to extrajudicial killings. Indeed, there are several reports on extrajudicial killings in Kenya, as well as numerous voices calling for an end to these killings, including firm action to reinstate the rule of law (Cornel, 2021; Human Rights Watch, 2019; Kenya Human Rights Commission, 2021; Kiprono, 2021; Osen, 2022; Protection International, 2020; Voanews, 2020a, 2020b). The sensitivity and complexity of this study on extrajudicial killings arise out of the background. Kenya was a British Colony in 1898 and gained independence in 1963. Kenya was a one-party State from

1963 to 1992, when multiparty democracy was accepted. During the colonial period and in the one-party State, there were several incidents in which people were killed, and this was attributed to State machinations to stamp their authority and hence the conviction that certain killings and disappearance of people is state instigated. In addition, there is a high crime rate. Besides, terrorism has been a significant factor culminating in the bombing of the United States embassy in 1998, in which 298 people were killed and now the Kenyan invasion of Somali (2009) in a bid to fight terrorism. All these incidents lead to the disappearance and killings of criminals, persons of diverse political opinions and others perceived to be radicalised.

Several organisations and reports should guide the country towards increased human rights that incorporate police reforms (Amnesty Kenya, 2021; Osse, 2007; Republic of Kenya, 2010; 2011), including aspects of police-community relations (Njoroge, 2018) and policing and community in the World and in Kenya (Mwaura, 2014; Ruteere & Pommerolle, 2003; Slobogin, 1996; Thomassen 2013; Tyler, 2006). At the helm are the police and hence the suspicion and conclusion that police could, and are indeed involved in extrajudicial killings. The government must therefore take stringent measures to restore the rule of law and put an end to all crimes, including any that could be instigated by the State, carried out by the police or covered up by the State or its agents such as the police since inadvertently, it amounts to extrajudicial killings.

Acknowledgments

The researcher acknowledges Arden University for the glad opportunity to be part of the greater academic fraternity. I also acknowledge with utmost gratitude all the participants who took part in this study.

Declaration of Conflicting Interests

The author declares no potential conflicts of interest with respect to the research, authorship, and/or publication of this article.

Funding

The author did not receive any funding support for the research, authorship, and/or publication of this article.

References

- Afolayan, M. S., & Oniyinde, O. A. (2019). Interviews and Questionnaires as Legal Research Instruments. *Journal of Law, Policy and Globalization*, 83, 51 - 59. DOI: 10.7176/JLPG.
- Amnesty International (2013). Police Reform in Kenya. 'A Drop in the Ocean.' Amnesty International. <https://www.amnestykenya.org/firm-action-can-end-extrajudicial-killings-in-kenya/>
- Amnesty Kenya (28th, March 2021). Firm Action can end extrajudicial killings in Kenya. Amnesty Kenya.org. Retrieved 8th November 2021.
- Anderson, D. M. (2002). Vigilantes, violence and the politics of public order in Kenya. *African Affairs*, 101(405), 531 - 555.
- Andvig, J. C., & Barasa, T. (2011). Cops and crime in Kenya. *Norwegian Institute of International Affairs*, 1 - 131.
- Bailey, W. C., & Peterson, R. (1994). Murder, Capital Punishment, and Deterrence: A Review of the Evidence and an Examination of Police Killings. *Journal of Social Issues*, 50(2), 53 - 74.
- Bell, J., & Waters, S. (2014). *Doing your research project: A guide for first-time researchers*. (5th ed.). (Open up Study Skills). Open University Press, McGraw Hill Education.

- Bouza, A. V. (2013). *The Police Mystique: An Insider's look at Cops, Crime, and the Criminal Justice System*. Springer.
- Bradford, B., & Loader, I. (2016). Police, crime and order: The case of stop and search. *The Sage handbook of global policing*, 241 - 260.
- Braithwaite, J. (1997). Charles Tittle's control balance and criminological theory. *Theoretical Criminology*, 1(1), 77 - 97.
- British Psychological Society (2021). *BPS Code of Human Research Ethics*. Leicester: The British Psychological Society.
- Brown, S.E., Esbensen, F. A. & Geis, G. (2010). *Criminology: Explaining Crime and Its Context*. (7th ed.). Cincinnati: Anderson Publishing.
- Chambliss, W. J. (1994). Policing the ghetto underclass: The policing of law. *Social Problems*, 41(2), 177 - 194.
- Chome, N. (2019). From Islamic reform to Muslim activism: The evolution of an Islamist ideology in Kenya. *African Affairs*, 118(472), 531 – 552.
- Cornel, E. (2021 30th December). Year in Review: MUHURI's Top Human Rights Events of 2021. MUHURI: Utetezi wa Haki. Retrieved 3rd January 2021, from <https://muhuri.org/year-in-review-muhuris-top-human-rights-events-of-2021/>
- Cote, S. (Ed.). (2002). *Criminological Theories: Bridging the Past to the Future*. Thousand Oaks: Sage.
- Creswell, J. (2002). *Research Design: Qualitative, Quantitative and Mixed Methods Approaches*. London: Sage.
- Dawson, C. (2009). *Introduction to Research Methods*. Oxford University Press.
- Delisi, M. & Hochstetler, A L. (2002). An exploratory assessment of Tittle's control balance theory: results from the national youth survey. *The Justice Professional*, 15(3), 261 - 272.
- Franfort-Nachmias, C., Nachmias, D., & DeWaard, J. (1996). *Research methods in the social sciences*. London: Edward Arnold.
- Goldschmidt, J., & Anonymous (2008). The necessity of dishonesty: police deviance, 'making the case', and the public good. *Policing & Society*, 18(2), 113 - 135.
- HAKI Africa (2016). What Do We Tell the Families? Killings and Disappearances in the Coastal Region of Kenya 2012 - 2016. Retrieved 31st October 2021, from http://haki africa.or.ke/wp-content/uploads/2019/01/HakiAfricaWDWTTTF_V14.pdf.
- Hans-Martin, S. (2007). *The History of the Kenya Police 1885 - 1960*. Mombasa: A Research Report by Hans- Martin Sommer, N M K.
- Hood, R. (2001). Capital punishment: A global perspective. *Punishment & Society*, 3(3), 331 - 354.
- Hope, K. R. (2019). The police corruption "crime problem" in Kenya. *Security Journal*, 32(2), 85 - 101.
- Houglund, S., & Allen, J. (2015). Police Officers and Crime: An Analysis of Crimes Committed by Police Officers in the State of Florida. *Law Enforcement Executive Forum*, 15(3), 16 - 27.
- Human Rights Watch (2021). *World Report: Events of 2020*. New York: Human Rights Watch.
- Human Rights Watch (25th February 2018). Kenya: Fresh Evidence of Election-Period Abuses. Police, Armed Gangs Killed Dozens. Retrieved 31st October 2021, from <https://www.hrw.org/news/2018/02/25/kenya-fresh-evidence-election-period-abuses>.
- Human Rights Watch (2nd, July 2019). Kenya: Nairobi Police Executing Suspects. <https://www.hrw.org/news/2019/07/02/kenya-nairobi-police-executing-suspects>. Retrieved 31st December 2021.
- Kenya Human Rights Commission (2021). *Annual Report: Enhancing Human Rights-Centred Governance at all levels*. Nairobi: The Kenya National Commission on Human Rights.

- Kenya National Commission on Human Rights (2008). *'The Cry of Blood': Report on Extrajudicial Killings and Disappearances*. Nairobi: The Kenya National Commission on Human Rights.
- Kiprono, D. (2021, 29th March). Firm action can end extrajudicial killings in Kenya. Retrieved 12th December 2021, from <https://www.amnestykenya.org/firm-action-can-end-extrajudicial-killings-in-kenya/>.
- Kivoi, D. L., & Mbae, C. G. (2013). The Achilles' heel of police reforms in Kenya. *Social Sciences*, 2(6), 189 - 194.
- Kivoi, L. (2020). *Why violence is a hallmark of Kenyan policing. And what needs to change - The Mail & Guardian*. The Mail & Guardian. Retrieved 9th November 2021, from <https://mg.co.za/africa/2020-06-08-why-violence-is-a-hallmark-of-kenyan-policing-and-what-needs-to-change/>.
- Leedy, P., & Ormrod, J. (2015). *Practical research: planning and design* (11th ed.). Harlow: Pearson
- Maina wa Kinyatti (1987). *History of Resistance in Kenya, 1884 - 2002: 'The Reign of Terror.'* Nairobi: Mau Mau Research Centre.
- Maina wa Kinyatti (2016). *Dedan Kimathi Speaks: We will Fight to the Last Gun*. Nairobi: Mau Mau Research Centre.
- Mathenge, O. (2020). Unsolved Moi-era murders that officials called suicide. *The Star*. Retrieved 20th November 2021, from <https://www.the-star.co.ke/news/2020-02-04-unsolved-moi-era-murders-that-officials-called-suicide/>.
- McMillan, K. (2011). *How to Write Dissertations & Project Reports*. Prentice-Hall.
- MUHURI (2015). *Report on Youth Radicalization at the Coastal Region of Kenya*. Muslim for Human Rights (MUHURI).
- Muthama, J. N. (2015). *Tears for my Motherland: Sorry State of the Nation and Solutions for making things right*. Nairobi: Nairobi Academic Press.
- Muthama, J. N. (2022). *An Investigation into Extrajudicial Killings by the Police in Kenya*. Arden University, United Kingdom.
- Mwangi, M. W. (2019). *A Critique of the Police Oversight Mechanisms in Kenya in Relation to Extrajudicial Killings Conducted by the Police*, Bachelor of Law Dissertation, Riara University. Nairobi: Riara University.
- Mwaura, R. M. (2014). *Factors that affect effective implementation of community policing in Kenya: a case of Kajiado north Police division* (Doctoral dissertation, University of Nairobi).
- Njoki, E. W. & Gachihi, G. (2020). Police Violence and the Criminalisation of the Poor in Kenya. Retrieved 3rd November 2021, from <https://www.versobooks.com/blogs/4791-police-violence-and-the-criminalization-of-the-poor-in-kenya>.
- Njoroge, J. W. (2018). *A Critique of police oversight mechanisms in Kenya with regard to extrajudicial killings*. Nairobi: Strathmore University.
- Obadha, A. A. (2018). *Assessment of International Human Rights Instruments and Their Application on Extrajudicial Killings by the National Police Service in Kenya*. (Doctoral dissertation, United States International University-Africa).
- Ombati, C. (2016, 7th December). Kenya police behind killings and disappearance of 81 people in Coast over terror war: HAKI Africa. Nairobi: *The Standard*. Retrieved 15th December 2021, from <https://www.standardmedia.co.ke/kenya/article/2000226081/kenya-police-behind-killings-and-disappearance-of-81-people-in-coast-haki-africa>.
- Osen, G. (2022, 4th January). Police tortured, Killed 114 people in 2021 -Lobby. Nairobi: *The Star*. Retrieved 7th December 2022, from <https://www.the-star.co.ke/news/2022-01-04-police-tortured-killed-114-people-in-2021--lobby/>

- Osse, A. (2007). *Understanding policing, a resource for human rights activists*. Amsterdam: Amnesty International Dutch section.
- Osse, A. (2016). Police Reform in Kenya: A Process of ‘Meddling Through’. *Policing and Society*, 26(8), 907 - 924.
- Otieno, B. (2020a, 28th August). Three abducted clerics return after 12 days in custody. Nairobi: *The Star*. Retrieved 5th December 2021, from <https://www.the-star.co.ke/counties/coast/2020-08-28-three-abducted-clerics-return-after-12-days-in-custody/>.
- Otieno, B. (2020b, 16th September). Abducted Mombasa trader Taitumu still missing, a month later. Nairobi: *The Star*. Retrieved 27th December 2021, from <https://www.the-star.co.ke/counties/coast/2020-09-16-abducted-mombasa-trader-taitumu-still-missing-a-month-later/>.
- Otieno, J. & Akeyo, I. (2018, 31st October). Dandora police killings spark outrage. Nairobi: *The Star*. Retrieved 17th December 2021, from <https://www.the-star.co.ke/news/2018-10-31-dandora-police-killings-spark-outrage/>.
- Otiso, W. N., & Kaguta, R. J. (2016). Kenya at Fifty: State Policing Reforms, Politics, and Law, 1963 - 2013. In Kithinji, M. M., Koster, M. M. & Rotich, J. P. *Kenya After 50: Reconfiguring Historical, Political, and Policy Milestones* (pp. 221-244). Palgrave Macmillan.
- Praxides, C. (2021, 23rd November). Kenya records highest number of enforced disappearances. Nairobi: *The Star*. <https://www.the-star.co.ke/counties/coast/2021-11-22-kenya-records-highest-number-of-enforced-disappearances/>
- Protection International (2020, 14th February). [Kenya] Missing Voices issues a shocking report on the status of extrajudicial killings. Retrieved 5th December 2021, from <https://www.protectioninternational.org/en/news/kenya-missing-voices-issues-shocking-report-status-extra-judicial-killings>.
- Repko, A. & Szostak, R. (2017). *Interdisciplinary research: process and theory* (3rd edition). London: Sage Publications.
- Republic of Kenya (2009). *Report of the National Task Force on Police Reforms*, Nairobi. Government Printer.
- Republic of Kenya (2010). *The New Constitution of Kenya, 2010*. Nairobi: Government Printer.
- Republic of Kenya (2011). *National Police Service Act*. Nairobi: Government Printer.
- Republic of Kenya (2012). *Laws of Kenya: Penal Code*. Nairobi: Government Printer.
- Republic of Kenya (2015). *Revised Police Reforms Program Document, 2015- 2018: A Strategy Framework for Implementation of Reforms in the National Police Service*. Nairobi: Ministry of Interior and Coordination of National Government.
- Ruteere M., & Pommerolle, M. (2003). Democratising Security or Decentralising Repression? The Ambiguities of Community Policing in Kenya. *African Affairs*, 102(409), 587 - 604.
- Ruteere, M. (2011). More than political tools: The Police and Post-election Violence in Kenya. *African Security Review*, 20(4), 11 - 20.
- Slobogin, C. (1996). Testifying: Police Perjury and what to do about it. *University of Colorado Law Review*, 67, 1037 - 1060.
- Smith, (2012). Riots rage in Mombasa, Kenya over killing of Muslim cleric Aboud Rogo Mohammed (VIDEO) (2012). Retrieved 5th December 2021, from <https://theworld.org/stories/2012-08-28/riots-rage-mombasa-kenya-over-killing-muslim-cleric-aboud-rogo-mohammed-video>
- Stinson, P. M., Liederbach, J., & Brewer Jr, S. L. (2016). Police integrity lost: A study of law enforcement officers arrested. *The U.S. Department of Justice*, 1 – 671.
- Thomassen G. (2013). Corruption and Trust in the Police: A Cross-country Study. *European Journal of Policing Studies*, 1(2), 153 - 169.

- Tittle, C. (1995). *Control Balance: Toward a General Theory of Deviance*. Boulder, Colorado: Westview Press.
- Tyler, T.R. (2006). *Why People Obey the Law*. Princeton University Press.
- Van Stapele, N. (2016). 'We are not Kenyans': Extrajudicial killings, Manhood and Citizenship. *Conflict, Security & Development*, 16(4), 301 - 325.
- Van Stapele, N. (2020). Police killings and the Vicissitudes of borders and bounding orders in Mathare, Nairobi. *Society and Space*, 38(3), 417 - 435.
- Voanews (February 14, 2020a). Rights Groups demand end to Kenyan Police Extrajudicial Killings. Voanews.com. Retrieved 7th November 2021, from https://www.voanews.com/a/africa_rights-groups-demand-end-kenyan-police-extrajudicial-killings/6184275.html.
- Voanews (February 26, 2020b). UN Envoy urges Kenya to stop police extrajudicial killings. Voanews.com. Retrieved 7th November 2021, from https://www.voanews.com/a/africa_un-envoy-urges-kenya-stop-police-extrajudicial-killings/6184890.html.
- Walliman, N. (2010). *Research Methods: The Basics*. London: Routledge.
- Wango, G. M. (2015). *Counselling Psychology in Kenya: A Contemporary Review of the Developing World*. Nairobi: Kenya Literature Bureau.
- Wango, G. M., Wairire, G., & Odiemo, L. (2018). Counselling Interventions and the Use of Counselling Skills in Police Services in Kenya. *IOSR Journal of Humanities and Social Science (IOSR-JHSS)*, 23(7), 39 - 52.
- Warah, R. (16th August, 2021). A brutal pandemic: Kenya police under fire for the death of two brothers. Retrieved 15th December 2021, from <https://www.one.org/africa/blog/ndwiga-brothers-death-police-brutality-kenya/>.
- William, J. A. (2018). When Death Becomes Murder: A Primer on Extrajudicial Killing. *Columbia Human Rights Review*, 50(1), 116 - 184. Available at: <https://scholarlycommons.law.cwsl.edu/fs/278>
- Williams, K S. (2008). Using Tittle's control balance theory to understand computer crime and deviance. *International Review of Law Computers & Technology*, 22(1), 145 – 155.