Gender barriers in the Military Police: between paternalism, efficiency and unconstitutionality

Mariana B. Barreiras

Master's in criminal law and criminology from the University of São Paulo. Legislative Consultant for the Chamber of Deputies. Auditor of the Plenary of the Superior Court of Sports Justice for Football.

Abstract: Barrier clauses to the entry of women limited the presence of women in the Brazilian military police, setting the thresholds at 10% or 20% of the total force. In 2023, during a public examination for the Military Police of the Federal District, the rule was challenged in a direct action of unconstitutionality. Using the qualitative method and case study, it was concluded that the barrier clauses were discriminatory and, therefore, unconstitutional and that the legal and legislative mechanisms activated proved to be effective in promoting a historic entry of 25% of women among those approved. Women aspire to join the military police forces, despite the paternalistic arguments that the barrier clauses existed to protect them. The police and the Brazilian population can benefit from the elimination of barrier clauses, since policing carried out by women is effective and, in general, more attached to compliance with rules compared to male policing.

Keywords: Military Police; women; gender; barrier clause; unconstitutionality.

1. Introduction

In 2023, Brazil underwent a historic change regarding gender equality. This involved eliminating clauses that prevented women from joining the military police force. Historically, the number of positions reserved for women has ranged from 10% to 20% of the total number of members of the force, depending on local laws on the subject. So much so that, in 2024, women made up 12.8% of all military police personnel in Brazil, according to data from the study *Raio-x das forças de segurança pública do Brasil* (Fórum, 2024b, p. 44).

The discriminatory practice – which was not based on objective justifications and used as arguments indeterminate concepts such as the "nature of police activity" or the "peculiar psychological formation" of women – stemmed from the militaristic nature of the police forces in Brazil, while at the same time reinforcing it. The virile warrior ethos was valued, with little room for debate about other styles of policing.

During the 2023 competition for the Military Police of the Federal District (PMDF), the issue ended up being taken to the Federal Supreme Court and the 10% limit in place in the Federal District was finally and paradigmatically considered unconstitutional. Interestingly, between the filing of Direct Action of Unconstitutionality (ADI) 7433 and its judgment on the merits, the contested rule was revoked by the National Congress, but the STF chose not to recognize the supervening loss of purpose and to address the merits. At the same time, starting in the last months of 2023, state rules of other police corporations were challenged in court before the STF and a series of compositions and decisions by the Court began to eliminate the barrier.

This study is based on the hypothesis that a growing number of women are aspiring to join the military police force and that, with the repeal of the barrier clauses, Brazil will move closer to a scenario with greater gender parity in the force. It is not uncommon to find paternalistic arguments defending that the exclusion of women from these positions is done in defense of the female category itself, which, with this measure, finds itself freed from the hard work of fighting Brazilian crime. This is, in fact, what can be read in an official letter from the PMDF commander-general on the subject (Kicis, 2019). Another related and consequential hypothesis, which cannot be the object of any type of empirical conclusion in this text or in any other in the short term, is that, with the elimination of limits on female participation, society will benefit, since qualified people – women and men with varied and valuable attributes – will make our police forces more representative of the population, more permeable to different world views and more likely to resolve situations in an alternative way to the use of force, without loss of efficiency.

To this end, the text intends to conduct a case study of the judicialization of the PMDF public service exam, considered paradigmatic for Brazilian society and, more specifically, for the first volume of the Plenário Journal because: (i) it was, in the recent trend of judicialization of police exams, the first ADI filed to address the issue; (ii) a federal law, born in the National Congress, was challenged, and the lawyers were urged to speak out in the proceedings; (iii) an electoral party, with broad representation in the Chamber of Deputies and the Federal Senate, presented itself as the active party; (iv) its development encompassed a constitutional conciliation between the parties, which involved different Powers of Brazil; (v) the unconstitutionality of a law that had recently been revoked by the National Congress was judged; and (vi) refers to a competition that is at an advanced stage, which allows us to verify whether the legislative change and the jurisdictional provision were effective in making the selection process less discriminatory and whether the hypothesis that women want to perform this work function is confirmed.

After this introduction, the second part of the text contains an account of how the competition unfolded and its judicialization. The third part contains a comparison between the procedural statements of the Chamber of Deputies and the Federal Senate, within the scope of ADI 7.433. The fourth part analyzes the constitutional conciliation reached during the constitutional process so that the competition can be resumed. The fifth part contains observations on the revocation of the contested provision. The sixth part, the legal debate opens space for considerations of a criminological nature on the importance and efficiency of women in the police force. The seventh part analyzes the numbers of female and male police officers approved in the last stages of the PMDF competition, with a view to verifying whether the legislative and judicial measures proved adequate to allow for a wider hiring of women in the PMDF and, at the same time, to determine whether these are jobs from which the female categories want to be exempted or to get closer. The conclusions are contained in the eighth and final part.

2. The paradigmatic case: 2023 PMDF recruitment exam

In January 2023, the Military Police of the Federal District published Notice No. 4/2023 (Federal District, 2023), and began the public selection process for admission to the training course for enlisted personnel. Originally, the following vacancies were planned (Item 2 of Notice No. 4/2023):

Table 1: Number of vacancies for the combat military police corps

Position	Vacancies for general	Black people	Broad competition	Black people reserve registry

	competition	vacancies	reserve registration	
Male soldier	504	126	1008	252
Female soldier	56	14	112	28

Source: prepared by the author, 2025.

Only 11% of the positions were reserved for women, both in the vacancies already available and in those destined to form the reserve list; and both in the vacancies of general competition and in those reserved for black candidates. This limitation was supported by Law No. 9.713/1998, a federal law that establishes the Basic Organization of the PMDF, and which provided as follows:

> Art. 4 The number of female military police officers will be up to ten percent of the number of officers in each cadre.
>
> Sole paragraph. It will be up to the commander-general of the Military Police to set, in accordance with the provisions of the caput, the ideal percentage for each competition, according to the needs of the Corporation. (Brazil, 1998)

The first phase of the competition consisted of an objective test and an essay. Those who passed would be called for the following stages, consisting of a physical fitness test, medical and dental evaluation, psychological evaluation and, finally, an investigation into their past life and social investigation (item 9.1 of Notice No. 4/2023). If approved in all these stages, candidates would be called for inclusion in the PMDF and enrollment in the training course for enlisted personnel (item 17.12 of Notice No. 4/2023).

Still in the first phase, to have their essays corrected, candidates had to: achieve a minimum score of 60% in the objective test – 48 points out of a total of 80 –; and not obtain a score equal to zero in Portuguese or specific legislation applied to the PMDF (item 9.4 of Notice No. 4/2023).

In addition to these cut-off grades, there was a provision for a limit on the number of essay tests to be corrected (item 12.13 of Notice No. 4/2023):

Table 2: Number of essay tests to be corrected

Position	Maximum grade for essay correction: broad competition	Maximum score for correction of the essay: blacks
Male soldier	3,780	945
Female soldier	420	105

Source: prepared by the author, 2025.

After the objective test scores were released, only 2,573 men reached the cutoff score to have their essays graded. Among the female candidates, the opposite situation occurred, as 988 met this requirement, a number much higher than the number of essays initially expected to be graded.

The PMDF then decided, through Notice No. 74/2023, to make an adjustment to the cut-off grade, which was promptly seen as a maneuver to enable the classification of a larger number of men for the next stage. Item 9.4 of the Notice now has the following wording (our emphasis):

> 9.4 In order to pass the objective test, the candidate must, in addition to not being eliminated by other criteria established in this Notice: a) obtain at least 60% of the maximum possible score for the objective test, or 48 points. In the event of cancellation of questions, there will be a

> proportional adjustment, downwards, of the minimum passing score and consequently of the minimum number of questions for passing. (Federal District, 2023)

The candidates then organized themselves and formed the Committee of Women Approved in the PMDF Contest, with the purpose of questioning the constitutionality of the ceiling established by Law No. 9,713/1998.

As a direct result of this mobilization, the Workers' Party (PT) filed, in August 2023, ADI 7,433 against the provision of Law No. 9,713/1998, which limited the participation of women in the PMDF's ranks to a maximum of 10%.

The PT's central claim was that Article 4 of Law 9,713/1998 was materially unconstitutional, as it violated Article 5, caput, I, Article 7, XXX, and Article 39, § 3, all of the Federal Constitution. In short, the party argued that the criteria for entry into the career were discriminatory, arbitrary, and misogynistic. The initial claim states that the archaic and prejudiced idea that the police force must have a predominantly male and strong force completely ignores the fact that security forces currently have at their disposal vehicles, equipment, weapons, and immobilization and disorientation techniques capable of neutralizing another human being with minimal effort.

Minister Cristiano Zanin, appointed rapporteur, gathered, among other information, information from the Chamber of Deputies and the Federal Senate, houses that approved the legal diploma whose provision remained contested. After receiving the initial information, he granted a precautionary measure, ad referendum, to suspend the competition until the request for a preliminary injunction – to suspend the effects of art. 4 – formulated in the initial petition is analyzed, including to prevent the publication of results, provisional or final, and the call for new phases of the competition.

After a conciliation hearing, the mechanism and results of which will be analyzed in item 4, the competition was resumed. The following month, the contested provision was revoked by Law No. 14,724/2023. Even so, on the merits, the Court, by majority, ruled in favor of the request made in direct action to declare the unconstitutionality of art. 4 and, by extension, of the sole paragraph, of Law No. 9,713/1998. It was decided to modulate the effects, to protect the competitions already concluded, so that the decision was effective ex nunc to only cover ongoing and future competitions, due to legal security and social interest.

3. Statements from the Legislative Houses

To better understand the dialogue between the Legislative and Judicial Branches of the Republic in this case, we will now analyze how the legal teams of the Federal Senate and the Chamber of Deputies expressed themselves in their procedural information.

3.1 Federal Senate

The Federal Senate ruled that the ADI should be dismissed. In summary, it argued that interference by the Judiciary in the typical functions of the Legislative Branch can only be tolerated in exceptional and constitutionally permitted cases, which was not the case in this case.

The information explained that, from the outset, the contested rule had precisely the opposite objective, that is, to reduce discrimination against women in the PMDF. The rule had been designed to promote the unification of the PMDF's male and female personnel. In this context, in order to ensure that the constitutionally provided for equality between the sexes was observed, with the unequivocal participation of women in the general staff, a mandatory number was established to be observed for

the admission of female police officers. The option to set the maximum of one woman for every ten men in the staff, added the Senate's Legal Department, was understood as appropriate at the time due to the specific characteristics of police work.

Recognizing that society had evolved to recognize more broadly the scope of equality between men and women and that the proportion between female and male employees today should be different from what was once thought to be correct, the Senate's Legal Department argued that the STF should apply the decision technique known as evolving unconstitutionality over time or declaration of a law still constitutional and urge the National Congress to proceed with the normative update.

It was also added that in the two years prior to the preparation of the information, three bills had been filed in the Chamber of Deputies with the aim of changing the proportion of female and male personnel in the PMDF. Two of these bills were in regular progress in the National Congress, and seeking approval of a new legal text would be the appropriate means for the applicant to address the issue. In this argument that the Legislative Branch would be the appropriate forum to address the solution regarding the discriminatory rule, the Federal Senate also alleged that, once the declaration of unconstitutionality had occurred, a regulatory gap would arise and, consequently, a scenario of legal uncertainty.

Three observations seem relevant regarding the Federal Senate's statement: the first concerns the evolving unconstitutionality over time or the declaration of a law that is still constitutional.

In a master's research study conducted in 2009 at the University of São Paulo, entitled Women in the Military Police of the State of São Paulo: the difficult paradigm shift, we came across a certain lack of criteria that would make the barrier clause legitimate in that reality (Barreiras, 2009). However, it was possible to verify, at the time, in the literature on women in the Brazilian Military Police of the various units of the federation, a great silence about the unconstitutionality of the barrier clauses.

This silence is one of the signs that, in the time between the law's creation (1998) and the ruling that its article 4 was unconstitutional (2024), the interpretative scope of constitutional norms related to gender equality has expanded. The achievements of minorities are progressive over time. They depend on the process of maturation of the most diverse decision-makers involved and imply profound changes in society. As a result, the scope of the normative texts is gradually changing, even though their terms remain intact. Today, finally, it is easy to see that a norm that provides for a career with, proportionally, 90 vacancies for men and 10 for women, without concrete justifications for the reason for the discrimination, is unconstitutional. In the 1990s, the scope of the rule of equality between men and women was, possibly, different, more restricted.

This phenomenon has implications for constitutional control. The interpretative evolution within the scope of constitutional control may imply the censure of precepts previously considered compatible with the constitutional order (Mendes; Gonet, 2020). Hence the importance of discussing the effects of the declaration of unconstitutionality in each case. There are, in fact, cases like this in which norms may still be considered constitutional, but in the process of becoming unconstitutional, that is, in a transitional situation[1]. Some authors point out that factual changes are fundamental to characterize

[1] This institute was inaugurated in Germany in the 1960s, in the judgment of electoral laws that became outdated due to the change in the number of voters in each district. In Brazil, examples of the application of this supervening unconstitutionality due to changes in factual circumstances include cases involving the difficulty in equipping Public Prosecutor's Offices (HC 70514 Rio Grande do Sul) and changes in the socioeconomic data used as criteria for distributing the State Participation Fund (ADI 875/Rio Grande do Sul, ADI 1987/Mato Grosso and Goiás, ADI 3243/Mato Grosso and ADI 2727/Mato Grosso do Sul).

the hypothesis of an unconstitutionalization process (Mendes; Gonet, 2020). Others, when addressing this phenomenon of the "still constitutional" norm, point out that "not only the transformation of facts, but also that of values and the general understanding of the law itself may lead to the declaration of unconstitutionality of a norm previously seen as constitutional" (Sarlet; Marinoni; Mitidiero, 2019, p. 1,292). The fact is that, regardless of one view or another, the consequence here is the same. At the time of filing ADI 7,433, there was no longer any factual or constitutional context to support the thesis that the rule was still constitutional. Therefore, in ADI 7,433, the solution was to modulate the effects of the declaration of unconstitutionality.

The second observation regarding the Senate's Legal Department's statement concerns the time that governs the legislative process, which does not always coincide with the urgent demands of citizens. While it is true that Congresswoman Erika Kokay, a member of the Workers' Party itself, had submitted Bill No. 3,408/2012 with the aim of changing the percentage of women in the PMDF, it is not unnoticed that only 7 years after its filing did the draft receive an opinion – due to its unconstitutionality and unlawfulness, in fact – from the Committee on Constitution and Justice and Citizenship. As for the second bill mentioned in the Senate's statement – Bill No. 1,203/2023, authored by Congressman Pedro Aihara – two years after its presentation, it had only passed through one of the three committees that were supposed to look into it.

This is not intended to criticize the legislative dynamics of the Chamber of Deputies, which demands debates, which largely depends on the priorities of the national scenario and the political moment, and which involves processing an extensive list of projects annually[2]. The intention is simply to emphasize that, faced with a specific problem such as the one seen in the PMDF competition in 2023 – that is, the rejection of women with high scores and the relaxation of criteria to guarantee the progression of men in the stages of the competition –, the judicial route, with its preliminary remedies, is usually more appropriate than the legislative route. In this specific case, the legislative provision ended up anticipating the jurisdictional one, but, in addition to this not being the rule, it is believed that the sudden resolution of the problem in the National Congress only occurred because the judicial route had been activated and gave signs that, in that area, the rule would soon be considered incompatible with the constitutional order.

To argue, as the Senate's legal team did, that the Workers' Party, because it has representation in the National Congress and is aligned with the Presidency of the Republic, should have chosen the legislative route is equivalent to suppressing its ability to postulate in this constitutional action.

The right to file an ADI by political parties with representation in the National Congress was an express option of the 1988 constituent legislator with a view to guaranteeing rights, especially for groups that are to some extent underprivileged. "There is, therefore, a very broad understanding of the so-called defense of the minority within the scope of constitutional jurisdiction here" (Mendes; Gonet, 2020, p. 1,341). There is no reason to prevent political parties, in cases where a minority group of citizens needs to provide swift relief, from using the judicial route with its precautionary and compositional tools.

The political party is, in fact, the means par excellence for consolidating representative democracy and its legitimacy to propose an ADI is related precisely to the fact that the group has some – and, in

---

[2] There were more than 5 thousand bills presented in 2023, and more than 4 thousand in 2024.

the Brazilian system, it can be only one – active representative in Parliament. In fact, this legitimacy is so vast that no jurisprudential restriction arising from the link of thematic relevance falls on the parties (Sarlet; Marinoni; Mitidiero, 2019, p. 1,149). That is, it is not necessary for the subject debated in the ADI to be connected to the party's programmatic lines. It is, therefore, a universal, unrestricted legitimacy, arising from the very institutional purposes that justify the existence of political parties and from the desire of the Brazilian constituent to preserve the abstract jurisdictional action of the minority currents in Parliament (Bulos, 2023, p. 168).

The third observation concerns the unnecessary nature of the infra-constitutional rule. The idea that declaring the provision unconstitutional would create a regulatory vacuum does not stand up to closer analysis. The declaration of unconstitutionality of Article 4 would result – and did result – from its conflict with principles and normative commands of constitutional stature that would be directly applicable to the specific case. By providing that all are equal before the law, without distinction of any nature and, more specifically, that men and women are equal in rights and obligations, Article 5, I, of the Constitution, a fully effective rule, has direct, immediate and full applicability (Silva, 1999).

Similar reasoning applies to the prohibition of admission criteria based on sex, enshrined in art. 7, XXX, and replicated in art. 39 of the Constitution. In this case, the constitutional text establishes, in art. 39, § 3, that, in the case of civil servants holding public office, the law may establish differentiated admission requirements when the nature of the position so requires. In this case, we are faced with a rule of limited effectiveness. The constitutional command is directly and immediately applicable. However, it may not be fully applicable if there is a restrictive law (Silva, 1999). The law that imposed differentiated requirements existed and was based on completely arbitrary criteria, or rather, it only imposed the quantitative difference of positions without any justification. Its elimination from the legal world was beneficial and allowed the general command of equality to be fully applied.

In cases like this, in which the constitutional eloquence of guarantees did not leave room to talk about a normative gap, what has the potential to create legal uncertainty is never the silence of the infra-constitutional legislator, but the uproar created by legal commands that contradict the dictates of the highest law.

3.2 Chamber of Deputies

The Chamber of Deputies' Legal Department, in turn, adopted a very different stance in its brief. It limited itself to reporting on the procedure for approving Law No. 9,713/1998. It explained that the Executive Branch submitted the text of the law to the National Congress for consideration in April 1996. The designated rapporteur, Congressman Luciano Pizzatto, among other arguments, stated that the Ministry of Justice's intention in proposing the text was to remedy the injustices resulting from the existence of separate cadres of male and female police officers. At the time, the existing cadres of female military police officers – whether officers or enlisted men – were much smaller in relation to the cadres of male officers. As a result, their members suffered significant losses in their time for promotion. Regarding the limitation of vacancies at the 10% level, the minister would have only informed, without any additional justification, that, similar to other corporations, the proportion of one female military police officer for every group of ten male military police officers had been established.

Regarding the duplication of staff, the central theme of Bill No. 1,803/1996 – which gave rise to Law No. 9,713/1998 –, the rapporteur understood that

> [...] it would be unacceptable for such a discriminatory situation to continue, perpetuating and accumulating the losses suffered by military police officers in their promotions, which, in the end, end up acquiring the character of discrimination in pay, in violation of the constitutional precepts that preach equal pay for positions with equal or similar duties.

The document from the Chamber's Legal Department added that the text was approved in a conclusive manner by the National Defense Committee and the Constitution and Justice and Drafting Committee and then sent to the Federal Senate.

There is no information from the Chamber of Deputies regarding the merits of the action. And it goes beyond the scope of this article to analyze whether this practice of focusing more on the legislative process is standard practice in the statements of this House in constitutional actions. The truth is that the Parliament's legal departments have a delicate task in providing information on the constitutionality of federal norms. Positioning themselves in favor of a norm that reveals unconstitutional contours or contrary to a provision approved by the House itself is not a mission that can be accomplished without complexities.

Given the difficulties and importance of the issues involved – women and public safety –, it seems to us that the choice of the Chamber's Legal Department in this case was correct. Reporting details of the legislative process is more revealing to the general public – including the legal department – than professionals accustomed to parliamentary practice, which is still hermetic to the public, would assume. In other words, when the National Congress approved the law, it considered that it was in line with the current constitutional regime, and there is relevance in describing the details of this legislative activity. The information fulfilled this role well.

The legislative task, however, is not exhaustive in itself nor is it confused with that of the Judiciary. In times of intense debate about the limits of judicial activism, the controversy over to what extent the Judiciary should interfere in the other branches of government is challenging. However, in the case of the clause prohibiting women from serving in the police force, this controversy has no place.

The judicial activist stance is manifested through different conducts, which include: the direct application of the Constitution to situations not expressly contemplated in its text and regardless of the legislator's opinion; the declaration of unconstitutionality of normative acts based on criteria less strict than those of blatant violation of the Constitution; and the imposition of conducts or abstentions on the Public Power, notably in matters of public policies (Barroso, 2009).

It is one thing for the Supreme Court to expand the scope of the Constitution and occupy spaces of the related Powers, transforming itself into a true positive legislator (Moraes, 2019). It is quite another for the STF to provoke dialogue between the Powers and ensure that the literal text on gender equality of the Constitution, approved by the representatives of the people, is observed.

4. Conciliation

As previously mentioned, in the proceedings of ADI 7,433, a conciliation hearing was held in October 2023. Representatives of the Federal Public Prosecutor's Office, the Attorney General's Office of the Union, the Attorney General's Office of the Federal District, the Military Police of the Federal District, the Workers' Party, and the Ministry of Justice and Public Security were present. The parties agreed that, given the likelihood of unconstitutionality, the ongoing selection process, which was suspended at that time, could continue in the remaining pending stages, provided that the barrier clause was excluded. It was agreed that a broad competition list would be drawn up to ensure that the result of the qualifying phase would not be less than 10% of female candidates. The parties committed to

making efforts to ensure that the approved candidates would be welcomed into the institution with all their specificities.

When approving the agreement, the reporting minister Cristiano Zanin specified that, despite the conciliation agreed to continue that competition, the ADI should continue so that it could be processed and judged definitively.

Analyzing the conciliation initiatives at the STF, Correia Neto (2025) explains that the first agreement approved by the STF Plenary, in an objective process, was probably the one reached in the Claim of Noncompliance with a Fundamental Precept (ADPF) 165, in 2018, in which losses due to inflationary purges of the Bresser, Verão and Collor 2 plans were discussed. Since then, the cases have become more numerous, and the Court has seen the units that deal with this issue gain more precise institutional contours. The Center for Consensual Conflict Resolution (Nusol) is currently the STF unit responsible for supporting the offices in the search for and implementation of consensual solutions to conflicts. The results of the constitutional composition practice are numerically significant, and it is not uncommon for the conciliation process to result in the submission of proposals for regulatory changes to the Executive Branch or the National Congress, even with the setting of deadlines.

There was no such recommendation in the agreement for ADI 7,433. Nevertheless, the month after the conciliation was held, the contested provision was revoked at the initiative of the Executive and Legislative Branches. The legislative change can be seen as a positive, albeit undesirable, reflection of the constitutional compositional mechanism. In fact, agreements in constitutional jurisdiction constitute an improvement to be celebrated and a path to building interinstitutional consensus in difficult cases (Correia Neto, 2025).

After the agreement in ADI 7,433 was signed and approved, other conciliations with exactly the same theme were signed in ADIs 7,483 (RJ), 7,486 (PA) and 7,487 (MT). The barrier clauses provided for in different state laws had to be excluded from public examinations so that they could continue. After the filing of ADI 7,433, the Attorney General's Office filed at least 17 ADIs[3] with the STF against state laws that established percentages for the admission of women to the Military Police and the Fire Department.

It is interesting to note that competitions for military police officers, with barrier clauses, took place in Brazil every year. The mobilization of PMDF candidates, especially after the public notice maneuver to reduce the cutoff scores, and the action, before the STF, of a political party, then served as a trigger to reveal the unconstitutionality of a range of state norms, throughout the country.

5. Revocation of the challenged rule

As previously mentioned, once the agreement in ADI 7,433 was signed and approved, the Legislative Branch revoked the contested provision with the approval of Law No. 14,724/2023. The removal of that article from the regulatory world occurred in a peculiar manner. Bill No. 4,426/2023, the origin of the repealing law, was presented by the Executive Branch. It originally established the Social Security Queue Control Program and provided for the transformation of vacant permanent positions

[3] ADI 7,479 (Tocantins); ADI 7,480 (Sergipe); ADI 7,481 (Santa Catarina); ADI 7,482 (Roraima); ADI 7,483 (Rio de Janeiro); ADI 7,484 (Piauí); ADI 7,485 (Paraiba); ADI 7,486 (Pará); ADI 7,487 (Mato Grosso); ADI 7,488 (Minas Gerais); ADI 7,489 (Maranhao); ADI 7,490 (Goiás); ADI 7,491 (Ceará); ADI 7492 (Amazonas); ADI 7,556 (Rondonia); ADI 7,557 (Acre); ADI 7,558 (Bahia).

in the federal Executive Branch. During its processing, it received amendments that resulted in a much broader text. During the debates in the Plenary of the Chamber of Deputies, Congressman Carlos Jordy even used the term "fruit salad" to refer to the amended bill. In addition to the original themes, the new project regulated, among other matters, the extension of personnel contracts of the National Foundation for Indigenous Peoples (Funai), the granting of salary increases for police officers and firefighters in the Federal District and the revocation of the barrier clause to female participation in these military corporations.

Regarding the matter under analysis here, the rapporteur, deputy André Figueiredo, expressed himself as follows:

> One final suggestion we included in the bill was to revoke the outdated article 4 of Law 9,713 of 1998, with the aim of ensuring equal treatment between men and women who pass exams for the Military Police of the Federal District. Limiting the number of vacancies to just 10% of the number of employees in each PMDF group for women places them at a disadvantage, since even women who perform well in the exam will be overlooked due to this outdated and unjustified limitation.[4]

The issue of the disparity between male and female grades was highlighted in the arguments for the case, both in the judicial and legislative channels. The issue of grades, however, should not even be highlighted in the debate. There is a central and harmful point: equal rights between men and women. Everyone, men and women, needs good grades to enter public service careers. Using arguments linked to grades for female candidates could lead to the idea that equal rights between men and women depend on prior proof of female ability, in a dystopian return to the reasoning of when women were just beginning to occupy the public sphere. The rapporteur speaks of the anachronism of the limitation, and he is correct. No less untimely is the argumentative resource that uses the candidates' grades as a prerequisite for guaranteeing equal access and that reminds us of the words – almost a century old – of Carlota de Queiroz, Brazil's first female federal deputy, when she made her inaugural speech in the Plenary on March 13, 1934:

> Because we women must always keep in mind that it was by men's decision that we were granted the right to vote. And if they treat us this way today, it is because Brazilian women have already demonstrated how much they are worth and what they are capable of doing for their people." (Queiroz, 1934, p. 4)

Leaving aside the issue of arguments for now, the fact is that the provision of art. 4 of Law 9.713/1998 was revoked on November 14, 2023. When the merits of ADI 7433 were judged in May 2024, the vote of the rapporteur, Minister Cristiano Zanin, who recognized the unconstitutionality of the provision, was victorious, as already highlighted. The dynamics, prior to the judgment, of approval of a revoking rule by the National Congress was not mentioned, either in the report or in the victorious vote.

However, due to this action by the National Congress, Justice André Mendonça cast a dissenting vote in the sense of subsequent loss of the purpose of the ADI. The dissenting vote highlighted that the Legislative and Executive Branches had demonstrated, with the approval of Law No. 14,724/2023, that they were attentive to the discussions developed within the scope of that direct action and imbued with a clear and manifest intention to establish new protective standards in favor of female police officers. Therefore, they had readjusted the scope of normative protection that, as established by the previously current provision, had become an anachronistic, outdated and insufficient

---

[4] Shorthand note of the 194th Session of the 1st Ordinary Legislative Session of the 57th Legislature, held on 10/4/2023. Available at: https://escriba.camara.leg.br/escriba-servicosweb/html/70359 . Accessed on: March 7, 2025.

command. Since the intention of the Legislative Branch to circumvent constitutional jurisdiction was not verified, the revocation of the contested normative act would harm, in the view of Justice André Mendonça, and in line with the Court's case law, the judgment of the direct action.

Although Justice Nunes Marques agreed with the dissent, there is no record of any debate with the other members of the Court about the circumstance that the provision under judgment had already been revoked. The fact that it was a virtual trial session may have contributed to this dynamic of little exchange between the judges. In any case, the STF addressed the merits and dismissed the barrier clause, using the central argument that the Federative Republic of Brazil positions itself in the constitutional text in a manner contrary to prejudice, whether based on origin, race, color, age or sex, and other forms of discrimination.

6. Criminological aspects of women in police forces

Alongside constitutional arguments of equality between men and women, much of the criminological literature argues that the entry of women into police forces has the potential to be a boost towards the deconstruction of the hegemonic paradigm of valorization of virility, and consequently, violence, in these institutions. Therefore, it is worth briefly reviewing the history of women in the police force.

Until the 19th century, there was no room for women in the police force. Between 1903 and 1905, women began to be employed by the German police. They were mainly responsible for combating prostitution. At the same time, similar experiments were beginning in other parts of the world. In English (Myers, 1995), the term “municipal mothers” is used to refer to these first policewomen, who were generally upper-middle-class women who wanted, above all, to act as caregivers for those whose lifestyle revealed the need for a certain amount of discipline.

In England, a source of inspiration for modern policing, a body of volunteer policewomen was formed – Women Police Volunteers – to look after the greater London area in 1914, given the shortage of men due to the First World War. It was argued that it was because of the abnormal times of war that women were doing these “grotesque” things (Allen, 1973, p. 12).

In the United States, many middle-class women joined the police force during World War II. Initially, work with children and other women was a priority. From the 1960s onwards, the scope of work began to change, as the new policewomen did not conform to the limitations of a certain social sphere; many men had died or retired after the war, which created a shortage of workers; and several riots and conflicts emerged from the civil rights movements, to which the predominantly male police response was often permeated with brutality (Martin; Jurik, 2007).

In 1979, the United Nations General Assembly approved, in Resolution 34/169, the Code of Conduct for Law Enforcement Officials. The document expresses a clear concern for respect for human rights and fundamental freedoms of all people, without distinction. The text also expresses the notion that the way in which police activities are carried out has an immediate impact on the quality of life of the population. In order to address these issues, it is suggested that police agencies be representative of the population they protect.

In the same year, the Convention on the Elimination of All Forms of Discrimination Against Women was created – which would only be enacted in Brazil through Decree No. 4,377/2002, by whose art. 11 the signatory countries committed to adopting appropriate measures to eliminate discrimination against women in the employment sphere, especially strategies that would give women the same employment opportunities as men, with the adoption of equivalent selection criteria.

Given this scenario, the situation of women in the police force began to change significantly in the 1970s. Many police institutions modified their selection and promotion criteria, eliminating or adapting some requirements that barred women from entering, such as minimum height and weight limits; strict physical fitness tests that valued strength in the upper body – arms, back, chest, shoulders – (Martin; Jurik, 2007); and oral exams generally conducted by male police officers who did not hesitate to ask discriminatory questions to female candidates (Wells; Alt, 2005).

In Brazil, the Military Police of the State of São Paulo (PMESP) admitted women to its ranks before any other military institution. In 1947, outraged by the disastrous state of public transportation in the capital, the population armed themselves with sticks and stones and began to stone and burn buses and trams. The episode, known as the "Breakdown of Trams and Buses" (Duarte, 2005), led the Secretary of Public Security, Flodoardo Maia, to launch the "Friends of the City Police" campaign, to allow police officers to select "suitable and capable" citizens to collaborate in policing work on a trial basis. Some of the women belonging to the Women's Political Movement signed up and participated in the campaign. The fact that women joined the movement was symbolic in itself, as it demonstrated the desire that some women had, even at that time, to participate in public life, help the population and assist in policing.

In the early 1950s, with the increase in juvenile delinquency and prostitution, especially among young women, debates about the creation of a female police force in that state gained momentum. At the time, the Law School of the University of São Paulo had a unit called the Debate Center, whose women's department asked Professor Esther de Figueiredo Ferraz to study the subject. Ferraz was convinced of the need for women to be used, but only in certain areas of police activity. Reflecting, alongside the pioneering spirit, the thinking characteristic of her time, she stated:

> What needs to be investigated is whether the police need women. Whether there is room for female collaboration in the multifaceted and complex police activity, whether preventive or repressive. Whether there are positions in which this collaboration – given the specific qualities that characterize the weaker sex – becomes useful or even indispensable. Whether the public interest benefits from the presence of women in the police force, provided that they are assigned functions compatible with their skills and abilities. (Ferraz, 1955, p. 36 et seq.)

The professor added that women's responsibilities in the police should be, above all, assistance-related, social and preventive. Repressive and coercive tasks, "hardly suited to the true feminine personality", should remain the responsibility of men.

The state of São Paulo then instituted, through Decree No. 24,548/1955, a female police force within the then Civil Guard (the Military Police did not yet exist). The normative act explained that women could now reach certain positions because their ability had been demonstrated and proven. The text did not state that it was unfair to have excluded women from numerous activities in public life for so long, but that only now, after having proven that they were as capable as men, did it make sense to allow them to join the police force.

This reasoning is in line with Bourdieu's thinking (2002), which teaches us about the unnecessary need to justify the androcentric worldview, considered neutral[5]. What is always necessary is to justify

[5] Pierre Bourdieu explains that the division of things and activities according to the opposition between masculine and feminine is arbitrary and is part of a system of homologous oppositions that includes high/low, above/below, in front/behind, right/left, straight/curved, dry/wet, hard/soft, temperate/bland, outside (public)/inside (private). These schemes of thought, of universal application, record the differences as if the first characteristic of these pairs were natural, objective and evidently masculine, in opposition to the second characteristic, feminine. The strength of the

changes in the hegemonic pattern, that is, to explain why we want to give women the opportunity to do something that they have never been allowed to do.

According to the decree, women were considered to have a "peculiar psychological formation", which made their performance effective and advantageous in some areas of police activity, especially those involving minors or other women. These feminine psychological traits will be used repeatedly in speeches, literature and legislation regarding the employment of women in the police force. However, on the many occasions in which feminine psychological characteristics are mentioned, there is no further explanation as to what they are, exactly. No psychological study is cited as a source. The term "peculiar psychological formation" therefore ends up being adopted as a justification for the entry of women into the police force without there being any consensus on its exact content, in the same way that the proportion of one woman for every ten men will not be justified later.

After a four-year period, considered experimental by the São Paulo government, Law No. 5,235/1959 consolidated the institution of policing carried out by women and created the Female Police, which would be responsible for investigating and preventing crime and providing assistance, especially those related to the protection of minors and women.

Our first policewomen therefore assumed a role relatively similar to that of the American "municipal mothers" of the early 20th century. They were selected from highly educated women from good families. Instead of weapons, they carried a purse, which was part of their uniform. They helped the homeless population who occasionally turned to them and were always dealing with problems involving minors and prostitution.

The participation of women in the Brazilian military police was only nationally regulated on June 16, 1977, by an order from the Army General Staff.

> In normal policing activities, there are significant difficulties in effectively dealing with delinquent or abandoned minors and women involved in criminal offenses. In order to meet this field of police activity and also certain types of relationships with a specific public, in the interest of the Corporation, if deemed convenient, it is possible to provide the Military Police with female police officers. (Soares; Musumeci, 2005, p. 28)

In the Federal District, the first group of women was admitted in 1983. Women were only admitted if the police force deemed it appropriate, always with clauses limiting the number of personnel and in separate personnel groups from the original, which belonged to men. Over the decades, the movement to unify the groups gradually began to take place, and this was perhaps the first widespread achievement of guarantees among female police officers from different units of the federation. The unification of the groups contributed to the reduction of paternalism, implied the possibility of women working on an equal footing with their male colleagues and represented, for them, an opportunity to achieve greater professional fulfillment, since the service performed by men was more diverse and comprehensive in the force (Cappelle, 2006; Calazans, 2003).

Although the police force was largely unified, barrier clauses and resistance to the presence of women remained. A central problem of this distrust is the issue of the use of physical force. Egon Bittner (2003) explains that, with very few exceptions, police work generally involves doing something for someone through a procedure against someone. In other words, the police officer is, more often than not, between two people in conflict, and numerous situations arise in which it is

---

masculine order is evident in the fact that it dispenses justification: the androcentric vision imposes itself as neutral and does not need to be enunciated in discourses that aim to legitimize it.

necessary to use force, whether to enforce the law or to defend oneself or one's colleagues. Female physical build is then used as a factor of discrimination, although often without any empirically demonstrated data.

Despite being a priority task, fighting crime is not the only mission of the police. Dominique Monjardet (2003) estimates that fighting crime mobilizes no more than 15% to 20% of the police force. The police officer's routine is, most of the time, consumed by incidents that are far removed from the exciting and dangerous activities that people imagine or see on the news.

Lorene Sandifer (2006) compiled a series of studies that relate women and the use of force. Her collection of studies allows us to state that women, without compromising efficiency, are more likely and more capable of verbal solutions, which can be a benefit to police departments and society in general, especially in countries like Brazil, where excessive use of force is a hallmark of so many police forces. Sandifer demonstrated that female police officers cost their institutions less because they do not use as much force as their male colleagues. The incidents in which they are involved result in incidents less frequently. This means that a vicious cycle no longer exists: the fewer accidents, the fewer police officers are off work, the fewer lawsuits for compensation against police institutions are filed, and the fewer criticisms of the police. Good policing, Sandifer states, is not on our shoulders, but on our heads.

Some of the findings pointed out by Sandifer are worth highlighting. A study conducted by the Metropolitan Police Department of the District of Columbia in the United States evaluated two groups of police officers: one with 86 rookie men and the other with 86 rookie women. The study revealed that women tend to be more effective in preventing violence and defusing potentially violent situations. Another American study, published in 2003, revealed that 1.6% of complaints of excessive use of force were made by female police officers, while 98.4% were related to abuses committed by male police officers. Women were therefore underrepresented in the complaints, since in a 2000 report, they filled 13% of police positions in that country. Sandifer also comments that analyses would have allowed it to be concluded that while men see police work as an activity that involves control through authority, their female colleagues see it as a public service, which would result in better relations with the population, a more positive image of the institution and a greater likelihood of calming potentially violent situations. The communicative skills usually present in many women would be decisive in some encounters with citizens.

The National Center for Women and Policing, the leading research center on female police officers, conducted research that also demonstrated that women are less likely to be involved in incidents of excessive use of force (Lonsway; Wood, 2002). In this reasoning, it is important not to lose sight of the high lethality rates of several Brazilian military police forces (Fórum, 2024a).

Addressing another advantage of female policing and studying the widespread belief in Rio de Janeiro that female police officers are less corrupt than their male colleagues, Soares and Musumeci (2005) concluded that there is a virtuous circle in which expectations are confirmed by the practices they generate. Since women are seen as more honest, the public finds it difficult to approach them to suggest a deal, and their colleagues see them as untrustworthy as accomplices in irregularities. Thus, the people around them adopt more careful behaviors, and as a result, there is a certain break in the automatic reproduction of the codes of corruption.

There is, therefore, a significant amount of research demonstrating that women are not only capable of policing – especially considering the advent of new technologies, equipment, weapons and techniques capable of neutralizing another human being with minimal effort, as rightly pointed out

in the initial ADI – but can also play an important role if they have the wisdom to employ in policing the traits that have been socially attributed to them and cooperate to break a code of virility, violence, corruption and even neglect of their own mental health. A risk that is still present, since everything related to physical strength, courage, bravery and virility is extremely valued in our police institutions, is that women, seeking professional success, follow the trend of repeating what has always been done, consolidating practices that are not very republican.

Therefore, it is crucial that the police education system takes advantage of this historic moment and rethinks some of its methods and curricula. We want police schools that are less like barracks and more like spaces for debate, that incorporate and effectively replicate, for the entire institution and for society, the new worldviews brought by a larger number of women. We need academies and courses that embrace this repertoire of dialogue, non-violent conflict resolution, compliance with rules and good service to society.

This same educational system needs to promote sincere debates – internally and externally – about the idea that police officers spend a large part of their day involved in dangerous confrontations. Because even if confrontation is not a daily occurrence, the image of bravery and courage as typical attributes of police officers is not deconstructed. On the contrary, it is usually encouraged, even due to the positive value it has in society in general. This construction ends up forming part of the police culture itself, which makes it difficult to adopt new styles of police officers and policing that are based more on dialogue and problem-solving for the population than on the use of force.

Furthermore, criminology and constitutional norms demonstrate that restricting the options of female police officers to assistance or administrative tasks is not a solution when the aim is, in fact, to achieve emancipatory integration.

In the Brazilian debate on this topic, the words of Marcos Rolim (2006) cannot be left out, for whom the paradigm that police work is defined as that which corresponds to the monopoly of the use of force by the State should be replaced, with advantage, by the idea that it is the police's job to “protect people” or “ensure everyone the exercise of their basic rights”. Instead of a definition based on the power granted to the police authority, we would then have a definition based on what the police are expected to do. A definition of this type would make it possible for the role of the police to be perceived as even more important and, at the same time, would project a framework in which the notion of law – not force – is highlighted. From a humanist perspective, which the Brazilian population should yearn for, it is very important to define police work as that which is dedicated to a civilizing mission, something that its identification with the idea of “force” ends up hindering.

7. Women in the 2024 PMDF Training Course

As we saw in the first part of the text, Notice No. 4/2023 provided for 11% of vacancies for women in the PMDF competition. With the legal repeal of the discriminatory provision and the declaration of its unconstitutionality, the Training Course for Enlisted Personnel began in September 2024 with 324 women in the class of 1,264 students, approximately 25.63% of the total number of graduates.

There is, therefore, a demand for women to fill positions as military police officers. The next selection process for officers should also reveal a high demand from women. It is important to note that the PMDF is already a constant presence at the top of the annual rankings of the least violent police force in Brazil (Fórum, 2024a) and that the Federal District was the first unit of the Federation to have the position of commander-general occupied by a woman. These factors, combined with the exclusion of a barrier clause, should serve as attractions for the female public.

As in any other public service or competition, it is up to women to decide whether or not they want to apply. It is expected that male demand for police competitions will continue to be higher for a long time, either because the characteristics historically associated with men are valued in military institutions, or because the Brazilian public security scenario is, in fact, discouraging as a work environment, and this weighs more heavily on that portion of the population on whom the majority of family care duties fall.

Future research and Brazilian public institutions should remain vigilant regarding other barriers to women, more or less veiled, that may arise in police competitions and careers. In the PMDF competition itself, in February 2025, the Public Prosecutor's Office of the Federal District and Territories issued a recommendation that the PMDF recognize the illegality of the notice regarding the physical fitness test for women. For the running test, Notice No. 8/2023 established an increase in the minimum distance initially required for women, from 2,100 meters to 2,200 meters in 12 minutes, while reducing the requirement for men, from 2,600 meters to 2,400 meters. The Public Prosecutor's Office saw the maneuver as discrimination against female candidates, as it was a change without technical justification, which resulted in the elimination of 78 candidates who would have been approved if the original criteria had been maintained.

In a recent PMERJ competition, which was also the target of a direct action of unconstitutionality due to the barrier clause, the state's Judiciary granted, in 2024, a preliminary decision in favor of women in a public civil action[6] that challenged the requirement of gynecological exams in the seventh of nine stages. The MP questioned the requirement of these tests for female candidates without any corresponding procedure for men, the existence of a logical correlation between the criteria evaluated in these procedures and the exercise of police positions, and the invasive, uncomfortable and embarrassing nature of the exams.

These are two examples of requirements that discriminatorily hinder, because they are not technically justified, women's access to police positions, in a system that is now clearly unconstitutional, but which is far from being able to do without surveillance by Brazilian society.

8. Conclusion

The findings converge to the conclusion that the gender barrier clauses in the Brazilian military police were discriminatory, since they lacked any justification for the differentiation, and, therefore, unconstitutional, as was ultimately recognized by the STF in ADI 7433.

The role of the Brazilian Parliament's lawyers is difficult when they are asked to provide information in direct actions that challenge the validity of laws approved by the National Congress. Reporting on the legislative procedural process is a valid option, which provides relevant information, but not always easy to understand, to the judicial debate.

The mobilization of candidates for the PMDF competition and the existence, in ADI 7433, of conciliation that already mentioned the probability of unconstitutionality seem to have jointly and decisively contributed to the rapid action of the Executive Branch and the National Congress in revoking the contested provision.

---

[6] Case no. 0039292-50.2024.819.0000 TJRJ. Notice available at: https://conhecimento.fgv.br/sites/default/files/concursos/comunicado-pmerj-cfsd-decisao-juidicial-exame-ginecologico.pdf . Accessed on: March 9, 2025.

In the first PMDF competition after the regulatory change, judicial and legislative measures implemented proved effective in rejecting the gender barrier clause and in promoting a historic 25% increase in women among those approved. The hypothesis that women aspire to join the military police force is confirmed, despite the paternalistic arguments and the risks of the profession.

Future PMDF recruitment notices, which have not included a gender barrier clause since the beginning, are likely to have the potential to attract a large contingent of women, especially because the corporation has features that positively distinguish it from other Brazilian police forces. The PMDF, in particular, has the conditions to become a hotbed of ideas on how to properly include, listen to and multiply the new views brought by the growing contingent of women. Future analyses will be able to indicate the quality of this inclusion and, above all, the impact of these entries on society in the Federal District.

Police forces and the Brazilian population in general could benefit from a more generalized exclusion of barrier clauses, since policing by women is as effective as policing by men and women are less frequently involved in problematic episodes of excessive use of force, corruption and non-compliance with regulations.

It is important to observe whether other obstacles will be created in future competitions for Brazilian military police officers, such as unreasonable minimum height requirements, disproportionate levels of physical fitness testing, misogynistic social investigations or unreasonable health requirements. Furthermore, it is necessary to observe whether women will be widely integrated into the various fronts of police activities. The need for vigilance, therefore, does not end with the repeal of legislation or with the decisions of unconstitutionality by the Federal Supreme Court.

References

ALLEN, Mary S. The pioneer policewoman. New York: AMS Press, 1973.

BARREIRAS, Mariana B. Mulheres na Polícia Militar do Estado de São Paulo: a difícil mudança de paradigma. 2010. 182 f. Master's thesis (Law) – Universidade de São Paulo, São Paulo, 2010.

BARROSO, Luís Roberto. Judicialização, ativismo judicial e legitimidade democrática. Suffragium – Revista do Tribunal Regional Eleitoral do Ceará, Fortaleza, v. 5, n. 8, p. 11–22, Jan./Dec. 2009.

BITTNER, Egon. Aspectos do trabalho policial. São Paulo: Edusp, 2003.

BOURDIEU, Pierre. A dominação masculina. 2nd ed. Rio de Janeiro: Bertrand Brasil, 2002.

BRAZIL. Law No. 9.713 of November 25, 1998. Amends provisions of Law No. 6.450 of October 14, 1977, and provides other measures. Brasília: Presidency of the Republic. Available at: https://www.planalto.gov.br/ccivil_03/leis/l9713.htm. Accessed: Mar. 2, 2025.

BULOS, Uadi Lammêgo. Curso de direito constitucional. 16th ed. São Paulo: Saraiva, 2023.

CALAZANS, Márcia Esteves de. A constituição de mulheres em policiais: um estudo sobre policiais femininas na brigada militar do Rio Grande do Sul. 2003. 127 f. Master's thesis (Social and Institutional Psychology) – Instituto de Psicologia, Universidade Federal do Rio Grande do Sul, Porto Alegre.

CAPPELLE, Mônica C. A. O trabalho feminino no policiamento operacional: subjetividade, relações de poder e gênero na Oitava Região da Polícia Militar de Minas Gerais. 2006. 378 f. Doctoral dissertation (Business Administration) – Universidade Federal de Minas Gerais, Belo Horizonte, 2006.

CORREIA NETO, Celso de Barros. Acordos na jurisdição constitucional: um caminho para casos difíceis. Jota, Jan. 25, 2025. Available at: https://www.jota.info/opiniao-e-analise/colunas/observatorio-constitucional/acordos-na-jurisdicao-constitucional. Accessed: Mar. 8, 2025.

FEDERAL DISTRICT. Secretaria de Estado de Segurança Pública. Polícia Militar do Distrito Federal. Edital No. 04/2023-DGP/PMDF, de 23 de janeiro de 2023. Public Notice for the Public Entrance Examination for the Basic Training Course (CFP). Available at: https://arquivos-site.institutoaocp.org.br/publicacoes/edital-abertura-04-2023.pdf. Accessed: Mar. 12, 2025.

DUARTE, Adriano Luiz. O "dia de São Bartolomeu" e o "carnaval sem fim": o quebra-quebra de ônibus e bondes na cidade de São Paulo em agosto de 1947. Revista Brasileira de História, São Paulo, v. 25, n. 50, Jul./Dec. 2005. Available at: http://www.scielo.br/scielo.php?pid=S010201882005000200003&script=sci_arttext#back16. Accessed: Oct. 22, 2008.

FERRAZ, Esther de Figueiredo. Polícia Feminina. Militia, São Paulo, n. 55, p. 36–40, Jan./Feb. 1955.

FÓRUM BRASILEIRO DE SEGURANÇA PÚBLICA. 18º Anuário Brasileiro de Segurança Pública. São Paulo: Fórum Brasileiro de Segurança Pública, 2024a. Available at: https://publicacoes.forumseguranca.org.br/handle/123456789/253. Accessed: Mar. 9, 2025.

FÓRUM BRASILEIRO DE SEGURANÇA PÚBLICA. Raio-x das forças de segurança pública do Brasil. São Paulo: Fórum Brasileiro de Segurança Pública, 2024b. Available at: https://publicacoes.forumseguranca.org.br/handle/123456789/237. Accessed: Mar. 5, 2025.

KICIS, Bia. Relatório. Comissão de Constituição e Justiça. Projeto de Lei No. 3.408/2012. Brasília: Câmara dos Deputados, 2019. Available at: https://www.camara.leg.br/proposicoesWeb/prop_mostrarintegra?codteor=1800307&filename=Parecer-CCJC-2019-09-02. Accessed: Mar. 3, 2025.

LONSWAY, Kim; WOOD, Michelle. Men, women and police excessive force: a tale of two genders. The National Center for Women and Policing, 2002.

MARTIN, Susan E.; JURIK, Nancy C. Doing justice, doing gender. 2nd ed. Thousand Oaks: Sage, 2007.

MENDES, Gilmar F.; GONET Branco, P. Curso de direito constitucional. 15th ed. São Paulo: Saraiva, 2020.

MONJARDET, Dominique. O que faz a polícia. São Paulo: Edusp, 2003.

MORAES, Alexandre de. Direito constitucional. 35th ed. São Paulo: Atlas, 2019.

MYERS, Gloria E. A municipal mother. Corvallis: Oregon State University Press, 1995.

QUEIROZ, Carlota P. Discursos pronunciados na Assembleia Nacional Constituinte de 1934 pela primeira deputada brasileira. Rio de Janeiro: Oficinas Gráficas do Jornal do Brasil, 1934. Available at: https://bd.camara.leg.br/bd/items/c6c6981a-8aec-40e8-92ea-eb68d48db640. Accessed: Mar. 7, 2025.

ROLIM, Marcos. A síndrome da rainha vermelha: policiamento e segurança pública no século XXI. Rio de Janeiro: Jorge Zahar, 2006.

SANDIFER, Lorene. Police use of force: does gender make a difference? 2006. 67 f. Master's thesis (Criminology and Criminal Justice) – The University of Texas at Arlington, 2006.

SARLET, Ingo W.; MARINONI, Luiz G.; MITIDIERO, Daniel. Curso de direito constitucional. 8th ed. São Paulo: Saraiva, 2019.

SILVA, José Afonso da. Aplicabilidade das normas constitucionais. São Paulo: Malheiros, 1999.

SOARES, Barbara M.; MUSUMECI, Leonarda. Mulheres policiais: presença feminina na Polícia Militar do Rio de Janeiro. Rio de Janeiro: Civilização Brasileira, 2005.

WELLS, Sandra K.; ALT, Betty L. Policewomen: life with the badge. Westport: Praeger, 2005.